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THE IMPACT OF THE PAPERWORK REDUCTION ACT OF 1980 ON ADP IN DOD--ETC(U)

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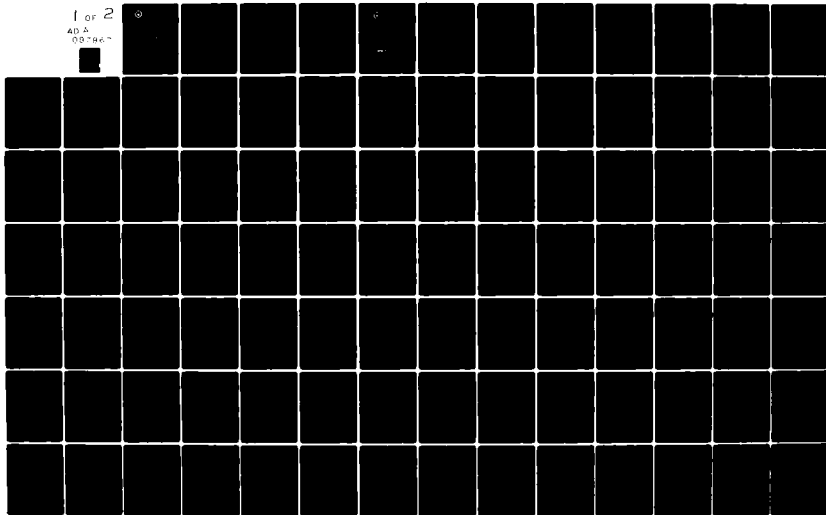
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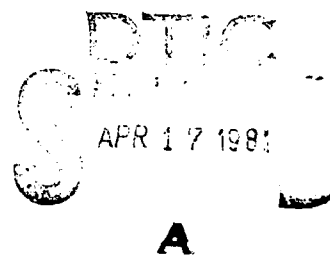


**DEPARTMENT OF DEFENSE  
ADP LONG-RANGE  
PLANNING PROJECT**

**THE IMPACT OF THE  
PAPERWORK REDUCTION  
ACT OF 1980  
ON ADP IN DOD**

**CONTRACT NO. MDA 903-79-C-0690**

**MARCH 27, 1981**



**ARTHUR YOUNG**

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20. ABSTRACT (Continue on reverse side if necessary and identify by block number) This report presents the findings and conclusions resulting from an impact study performed under a Long Range ADP Planning contract with the Directorate for Data Automation (Comptroller). The information and analysis of this study is intended to provide input into the DoD planning process in preparation for implementing the Law (96-511). The objectives of the study were:		

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To assess DoD program planning status in the areas addressed within the Paperwork Reduction Act with particular emphasis on automatic data processing (ADP), automated information systems (AIS) and Life Cycle Management (LCM).

To clarify the role of OSD in providing direction to the DoD Components and services in responding to the Law.

To identify DoD priorities for implementation of the provisions of the Law. ←

In this regard there are three broad areas which appear to be impacted by the Law:

ADP and information policies and procedures

Organizational structures and inter-relationships

ADP and information management tools and systems

The study also discusses the evolution of and key elements of the Law.

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CONTRACT NO/MDA 903-79-C-0690

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# ARTHUR YOUNG

ARTHUR YOUNG & COMPANY  
1025 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036

March 27, 1981

Mr. Harry Pontius  
Directorate for Data Automation  
OASD(C)  
Room 1A658, The Pentagon  
Washington, D.C. 20301

Reference: Contract No. MDA 903-79-C-0690

Dear Mr. Pontius:

Arthur Young & Company is pleased to submit this report in accordance with the above referenced contract, Task Order 4. This report presents our assessment of the impact of the Paperwork Reduction Act of 1980, commonly referred to as Public Law 96-511, on Automatic Data Processing (ADP) in the Department of Defense. Our assessment is essentially limited to the ADP arena within the Department of Defense.

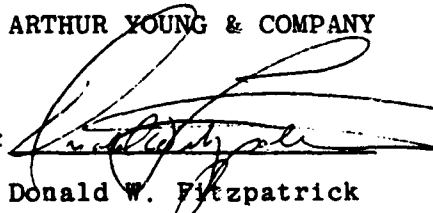
This study tracks the legislation during its evolution and after its enactment into Law. In spite of its title, the thrust of the Law is on the concept of information resources management, a philosophy which OMB and GSA have already begun to implement. Specific actions regarding implementation have not yet been finalized. We suggest that the Office of the Secretary of Defense continue to monitor the implementation process and work with OMB, GSA and other agencies to interpret the Law where necessary.

We look forward to further discussions with you on the impacts of P.L. 96-511. If you have questions concerning this report or any related matter, please do not hesitate to contact me or Dr. Craig M. Cook at (202) 828-7000.

Very truly yours,

ARTHUR YOUNG & COMPANY

By:

  
Donald W. Fitzpatrick

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**I.**

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**MANAGEMENT SUMMARY**

## I. MANAGEMENT SUMMARY

### 1. INTRODUCTION

Information is a valuable and costly resource of the U.S. Federal Government in general and the Department of Defense (DoD), in particular. Accurate, relevant, and timely information is vital to DoD in effective planning to achieve national security mission objectives, efficient execution of those plans in defense-related activities throughout the world, and appropriate feedback from the execution into the planning process. The management of this vast and essential resource has been the subject of considerable attention over the years, both within DoD and throughout the Federal Government. Numerous attempts have been made to establish individual programs aimed at managing various aspects of information, for example:

- . Managing the information requirements specification process as promulgated by DoD 5000.19 on information management and control
- . Controlling the information collection mechanisms such as forms or reports which is established by the Federal Reports Act and reflected in DoD Administrative Instruction No.15
- . Managing the final disposition of official Federal records and files in accordance with guidance issued by NARS
- . Coordinating the collection and production of statistical information
- . Ensuring the security and privacy of Federal information flows and holdings as specified by the Privacy Act of 1974
- . Managing the development of automated information systems through their entire life cycle which is prescribed in DoD Directive 7920.1
- . Managing the process of acquiring ADP equipment and software as prescribed by Federal Procurement Management Regulations and the Brooks Act of 1965.

Each of these areas has developed into a somewhat autonomous information discipline with its own set of policies, procedures, standards, guidelines, objectives, and organizational structures to manage information from that particular perspective. This pattern is common within DoD and throughout the Federal Government and has resulted in a series of independent programs with possibly conflicting policies and objectives, incompatibilities between manual and automated information systems, and insufficient communication among the various organizational elements responsible for managing information.

From a Government-wide perspective the Congress has been concerned with the overall efficiency and cost-effectiveness of the Government's information acquisition, transmission, processing, storage, use, and dissemination. One indication of Congressional concern was the establishment of the Commission on Federal Paperwork (CFP) which was convened during the late Seventies. An outgrowth of the over seven hundred recommendations made by the CFP was the need for revised legislation in the area of paperwork, regulatory reform and information management. A major conclusion of the Commission was the need for Government to address the underlying cause of excessive paperwork burden on the public, which the Commission determined to be the mismanagement of Federal information.

As a direct result of the Commission's findings legislation was introduced to Congress, entitled "The Paperwork Reduction Act of 1980" (H.R. 6410 in the House of Representatives and S. 1411 in the Senate). After hearings and revisions, the legislation was passed in December 1980 as Public Law 96-511. In spite of the emphasis on paperwork in the title of the Act, the main thrust of the new Law is on information resource(s) management in the Federal Government. The objectives of the Law are:

- . To minimize the Federal paperwork burden in the private and public sectors
- . To maximize cost-effectiveness of Federal information programs
- . To maximize usefulness of Federal information resources
- . To coordinate Federal information policies and practices
- . To enhance service delivery through appropriate use of ADP, telecommunications, and other information technologies
- . To ensure that Federal information practices are consistent with the Privacy Act.

This report presents the findings and conclusions of Arthur Young & Company resulting from an impact study performed under its Long Range ADP Planning contract with the Directorate for Data Automation (DDA) of the Office of the Assistant Secretary of Defense (Comptroller). The objectives of the study were:

- . To assess DoD program planning status in the areas addressed within the Paperwork Reduction Act with particular emphasis on automatic data processing (ADP) and automated information systems (AIS)
- . To clarify the role of OSD in providing direction to the DoD components and services in responding to the Law

- . To identify DoD priorities for implementation of the provisions of the Law
- . To provide a foundation for future, more in-depth studies and analyses of the issues relevant to the Law.

The study was conducted in two phases: 1) while the legislation was still under development in Congress; and 2) immediately after the legislation was enacted by Congress. As part of the study, interviews were conducted with personnel from OSD, the Military Services, selected DoD components, OMB, GSA, Congressional Staff, and other Federal Agencies to determine major impact areas and concerns related to the proposed legislation. Because this year marks the change of Administration and, consequently, the change of various personnel and interpretations of the Act, it was not possible during this study to obtain complete and specific implementation steps from OMB staff and other major agency personnel involved. Thus, the issues covered by PL 96-511 will be subject to continuous reassessment.

The emphasis of this study was focused on the ADP environment as an initial means for assessing the potential impact of the Law. This limitation of scope was set with the full recognition that ADP is just one aspect addressed by the Law, albeit an important, highly visible, and costly aspect. The information and analysis of this study is intended to provide input into the DoD planning process in preparation for implementing the Law, to suggest areas for management attention, and to identify opportunities for further related impact studies under the current DoD Long Range ADP Planning Project.

## 2. THE PAPERWORK REDUCTION ACT OF 1980: PL 96-511

The Paperwork Reduction Act of 1980 was discussed in Congress in two forms: H.R. 6410, the House bill, and S. 1411, the companion bill in the Senate. H.R. 6410, sponsored by Rep. Jack Brooks and others, was passed by the House of Representatives on March 24, 1980. S. 1411, sponsored by Sen. Lawton Chiles and others, was adopted by the Senate's Committee on Governmental Affairs on August 5, 1980. Several amendments to the Senate version were subsequently proposed. For the most part, these amendments addressed national security concerns raised by the Department of Defense and the U.S. Intelligence Community. The House and Senate versions were reconciled in the Fall, and the bills were enacted into law in mid-December 1980.

Basically, PL 96-511 calls for:

- (1) The establishment of an Office of Federal Information and Regulatory Affairs (OFIRA) within the Office of Management and Budget (OMB) to provide overall direction in the development and implementation of Federal information policies, principles, standards, and guidelines in the areas of:

- . Coordination of Federal information practices
  - . Review and approval of information collection requests
  - . Reduction of the paperwork burden
  - . Federal statistical activities
  - . Records management activities
  - . Privacy of records
  - . Interagency sharing of information
  - . Acquisition and use of automatic data processing and other technology for managing information resources.
- (2) The designation by each Federal agency of a senior official or, in the case of DoD, officials, reporting directly to the head of the agency to carry out the information management responsibilities of the agency in an efficient, effective, and economical manner and in compliance with the information practices prescribed by OMB. In this regard, each Agency shall, among other activities:
- . Systematically inventory its major information systems and periodically review its information management activities
  - . Ensure its information systems do not overlap each other or duplicate the systems of other agencies
  - . Develop procedures for assessing the paperwork and reporting burden of proposed legislation affecting the agency
  - . Assign to the senior official(s) the responsibility for the conduct of and accountability for any information technology acquisitions made by that agency
  - . Ensure the compliance of the agency with the requirements of the Federal Information Locator System
- In DoD, if more than one official is appointed, the respective duties of each official must be clearly delineated.
- (3) Establishment of the Federal Information Locator System in the OFIRA which shall be composed of a directory of information resources, a data element dictionary, and an information referral service

- (4) Continuation of OMB's information collection request clearance process
- (5) Periodic reviews of agency compliance and performance under the provisions of the Act and regular reports to Congress on overall progress under the law.

In addition, with respect to considerations pertinent to ADP, the Law establishes the following schedule for implementation by OMB:

- (6) Within one year of enactment
  - . Establish standards and requirements for agency audits of all major information systems (with noted exceptions)
  - . Establish the Federal Information Locator System (FILS)
  - . Develop a proposal to augment FILS to include data profiles of additional major information holdings
  - . Identify areas of duplication in information collection requests and develop a schedule for eliminating duplication
  - . Identify initiatives to reduce the paperwork burden of Federal grant programs
- (7) Within two years of enactment
  - . Establish a schedule and a management control system to ensure that practices and programs of information handling disciplines are appropriately integrated with Federal information policies
  - . Identify initiatives to improve productivity in Federal operations using information processing technology
  - . Develop a program to enforce Federal information processing standards at all Federal installations and to revitalize the existing standards development program
  - . Develop, in consultation with the General Services Administration, a five-year plan for meeting the automatic data processing and telecommunications needs of the Federal Government.

There were some considerations of particular interest to DoD in the House and Senate bills on points relating to national security activities and to the roles and responsibilities of the Director of the Office of Management and Budget, the Secretary of Commerce, and



the General Services Administration. These concerns were addressed during the hearings and mark-up so that the Law:

- . Exempts the collection of information during the conduct of intelligence or communications security activities
- . Does not affect or reduce the authority of the Secretary of Commerce or the Director of the Office of Management and Budget pursuant to Reorganization Plan No. 1 of 1977 relating to telecommunications and information policy, procurement and management of telecommunications and information systems, and spectrum use
- . Does not increase or decrease the authority conferred by Public Law 89-306 on the General Services Administration, Secretary of Commerce, or Office of Management and Budget (in particular, regarding the acquisition of ADP equipment).

### 3. IMPACT OF THE LAW ON DOD ADP ACTIVITIES

The impact of the Paperwork Reduction Act on the Department of Defense affects many information disciplines in addition to automatic data processing. This particular study, however, has focused upon identifying those aspects of the Law which may have some bearing on ADP in DoD. In this regard there are four broad areas which appear to be impacted by the Law:

- . ADP and information policies and procedures
- . Organizational structures and inter-relationships
- . ADP and information management tools and systems
- . ADP equipment acquisition.

In the area of ADP policy, DoD has long been a leader and therefore has already in place most of the ADP policies necessary to comply with the legislation (e.g., the DoD 5000 series and the Life Cycle Management of AIS). However, new or modified procedures may be required to meet explicit provisions of the Law, such as:

- . Development of an inventory of major DoD information systems
- . Reporting procedures for periodic information management reviews
- . Identification of potential applications of information technology for productivity improvement
- . Revitalization of the ADP and data element standardization process

- . Input into the Federal five-year ADP plan.

Several organizations are already in place throughout OSD, the Services, and DoD Components which address the policy-making and operational aspects of ADP and information management. At the OSD level, the Comptroller has the responsibility for policy in most of the information disciplines addressed by the Act while the ASD (C3I) has responsibility in the telecommunications arena. At the Service and Component level, there is no uniform organizational structure with regard to ADP and information management. Many different organizations are involved. While there is no apparent need for immediate reorganization within OSD, the Law will encourage closer coordination throughout DoD in terms of

- . Consistent and complementary policy development
- . Preparation of a comprehensive list for DoD information system developers which identifies and relates all of the ADP and information management procedures which must be followed
- . Sharing of tools and techniques to support the ADP and information management process
- . Identification of joint projects for testing the degree of productivity improvement achievable by the integration of information technology.

DoD has already developed several tools and techniques for supporting ADP and information management, including the IRCAS information locator supported by OSD and DoD's logistics information locator, LOGDRMS, and is in the process of creating DIALS as a DoD data dictionary and information locator system. In the continued development of such tools, however, close coordination will be required to ensure that:

- . An adequate interface to the OMB FILS effort is developed at the OSD-level as well as at the Service and Component level
- . The ADP system development requirements of data dictionaries are considered equally with the information management requirements
- . Other requirements such as the information system inventory are investigated for possible integration into a uniform system capability.

The subject of the approval of AIS plans and the acquisition of ADP equipment has been a source of concern for DoD for many years. Under the Brook's Act of 1965 (PL 89-306), the General Services Administration has the responsibility to review and approve major

Federal ADPE acquisition plans. OSD's timing, level, and form of involvement in this process has varied with the originating component, the size of the procurement, or the degree of difficulty encountered. The enactment of PL 96-511 is indicative of a renewed interest in Congress for improvements in the ADPE acquisition process and, therefore, provides DoD with an opportunity to work closely with GSA, OMB, and Congress in shaping those changes. Areas to be addressed for possible improvements might include:

- . Increased delegation of procurement authority
- . Earlier and continued involvement of GSA, OMB, and Congress in understanding the overall mission of various DoD programs which eventually will require AIS support
- . A further clarification of responsibilities and authorities for ADPE acquisition
- . A shift in focus from just controlling the ADPE acquisition process to the management of the entire AIS life cycle (as indicated by DoD Directive 7920.1).

During the course of the study several concerns were raised by DoD personnel regarding the proposed legislation. The major concerns included:

- . The need for exemption of the Command, Control, Communications, and Intelligence Community from the provisions of the Act
- . The need to curtail any possible expansion of the current level of authority of the General Services Administration in the area of ADP equipment acquisition, and in particular, to deter GSA from having authority over the specific approval of DoD mission requirements for ADP systems
- . The need for a uniform interpretation of the legislation and consistent DoD directives prior to implementation by any DoD Service or Component
- . The need for better coordination among the information automation, information communication, and information management functions which already exist both at the OSD level as well as within the Services and Components
- . The availability and amount of resources that will be required to comply with the dictates of the law, especially the development of systems to interface with or support the Federal Information Locator System.

The first two of these issues were discussed in the legislative review and amendment process and are addressed in the Law. The Law explicitly

defines ADP and telecommunications equipment in such a way as to exclude many of the National Security activities of the C3I community from the ADP and telecommunications provisions of the Act. However, this exclusion may not apply to the other information management aspects of the Law and further clarification of this point should be obtained. The Law also makes the disclaimer that "nothing in this chapter shall be interpreted as increasing or decreasing the authority conferred by PL 89-306 on the Administrator of the General Services Administration, the Secretary of Commerce, or the Director of the Office of Management and Budget." Therefore, the C3I community's responsibilities under PL 89-306 are not changed.

With respect to GSA's role and responsibilities, it was learned at a meeting of the Interagency Committee on ADP, February 10, 1981, that officials from GSA view the Law as placing an emphasis on the managerial aspects of GSA's role in ADP procurement over the operational role. They are looking at mechanisms for coordination, fair standards, and other managerial policy areas. GSA's role under the Law remains an issue, however, that warrants further monitoring.

The other three issue areas involve implementation steps which OSD will need to address as OMB and other agencies deal with specific details of the Law. These issues are discussed in greater detail throughout the remainder of the report.

#### 4. CONCLUSIONS AND RECOMMENDATIONS

Based upon the findings of this study, Arthur Young & Company recommends that, in the near-term, OSD:

- (1) Take the lead in defining a uniform DoD-wide interpretation of the provisions of the Law through the:
  - . Development of guidelines for establishing the senior official(s) in OSD and the Components and Services
  - . Identification of key issues to be resolved
  - . Interpretation of the intent of the enacted legislation
  - . Establishment of coordinated information policies
  - . Pronouncement of specific implementation procedures
  - . Identification of priorities
  - . Definition of terminology
  - . Announcement of the availability of relevant tools and machinery

- . Development of alternative models of the functions and organizational interrelationships which may be required
- (2) Establish closer coordination among the OSD offices directly involved with the implementation of the Law through:
  - . A joint OSD information management policy study team
  - . Increased cooperation in the implementation of DIALS
  - . Increased participation by the DDA in the data element standardization process
- (3) Plan to work closely with OMB, GSA, GAO, and Congress in shaping the implementation of the Federal information management program by:
  - . Participating in Federal task forces set up to define the implementation of the program
  - . Considering serving as a lead agency for some selected aspect of the program of particular interest to DoD
  - . Establishing or reconfirming the policy and working level relationship between DoD and these organizations.

In the longer-term, the Law reflects a clear shift in emphasis toward the concept of managing information as a resource throughout the Federal Government. Information resources management (IRM), as initially outlined by the Commission on Federal Paperwork, is a trend which is expected to grow during the decade of the Eighties and one which will be given added impetus by the legislation. IRM is a relatively new concept which draws upon several disciplines in an attempt to manage the information life cycle from requirements definition and information acquisition through transmission, processing, storage, use, and final disposition. The result is an agency-wide view of information as existing independently from the various information systems (automated or manual) which handle it. This concept is receiving considerable attention throughout the Federal Government (e.g., the Headquarters, Department of the Army and the U.S. Department of the Interior), but it is still in its formative stages and is not uniformly defined nor well-understood. Public Law 96-511 is a step in that direction.

The IRM approach, as embodied in the Law, will impact four major areas of information disciplines:

- . ADP and the life cycle management of automated information systems

- . Information management, including the management of information requirements, forms, reports, and data elements
- . Records management and the disposition of official Federal information
- . Telecommunications and the transmission of information electronically, largely in the context of ADP.

DoD already has several policies, tools, and functions aimed at addressing the management of these four areas. To the extent that these DoD policies, tools, and organizational structures are coordinated and mutually supporting, DoD stands in good position to implement the provisions of the Law. Recognizing the possibility that DoD may ultimately move in the direction of information resources management, Arthur Young & Company recommends that, in the long-term, OSD:

- (4) Prepare for a more in-depth study of the implementation of information resources management in DoD to address such issues as:
  - . Questions of organizational responsibilities, scope of the program, relevant policy revisions and appropriate tool development
  - . The synergy to be obtained from a blending of the relevant information disciplines
  - . The role of ADP in contributing to the overall management of information
  - . Possible revisions to the MOS and civilian career specialty structure to accommodate a career development path for information resource managers
  - . The need to establish or enhance IRM training programs or to provide greater IRM orientation in existing management and ADP training activities
  - . The need to develop an IRM educational program across DoD to explain the IRM concept and to create a dialog of the relevant issues, problems, and alternative approaches.

The Paperwork Reduction Act is the latest and most comprehensive in a series of attempts to improve the management of Federal information resources. The significant contribution of the Act is not so much the new techniques or managerial requirements expressed, but rather the underlying concept upon which it is based: the management of information as a resource of the Federal Government. The Act provides OSD with an opportunity to improve its current ADP and

information management posture. It will generate renewed management and organizational interest in the activities of DoD's information resource managers and can serve as an impetus to existing programs, such as information systems Life Cycle Management, information processing standards, data base management and data dictionary system deployment, the internetworking of computers, and the management of the proliferation of minicomputers and other related information technologies. Finally, the IRM concept can provide a framework for better coordination among DoD's many policies, procedures, and organizational responsibilities for managing its information resources.

The Law is scheduled to take effect on April 1, 1981. In anticipation, OMB has already established an Office of Information and Regulatory Affairs with responsibility for the creation of the Federal Information Locator System, the management of the Information Collection Budget, and the review of the connection between information and regulatory policies. With the passage of PL 96-511, and nearly simultaneously, the start of a new Administration, such activities can be expected to proceed in earnest. DoD can improve its dealings with OMB and GSA by beginning now to define its interpretation of the Law and providing substantive input to OMB in shaping the implementation of the Paperwork Reduction Act of 1980.

## **II.**

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### **IMPACT STUDY BACKGROUND AND APPROACH**



## II. IMPACT STUDY BACKGROUND AND APPROACH

Public Law 96-511 is aimed at reducing paperwork and improving the management of information resources within the Federal Government. The overall objective of the Law is to achieve widespread and significant improvements in the Federal Government's methods for collecting, processing, and reporting information.

The purpose of this study was to assess the potential impact of this Law on automatic data processing (ADP) activities in the Department of Defense (DoD). The purpose of this chapter is to describe the support being provided to the Office of the Secretary of Defense (OSD) by Arthur Young & Company in DoD's ADP long range planning efforts and to acquaint the reader with the impact study's objectives and the approach taken in conducting the study. Several conclusions concerning the DoD Component's perception of the study effort, problems encountered, and initial benefits gained by both OSD and the Components through conducting the impact study are developed in the final section of this introductory chapter.

### 1. STUDY OVERVIEW

The following material provides a general description of the purpose and objectives of both the DoD Long Range ADP Planning Project and the impact study on the Paperwork Reduction Act conducted by Arthur Young & Company as part of its support to OSD's ADP planning efforts.

#### (1) DoD Long Range Planning Project Background

Our entrance into the new decade is marked by a growing awareness that it is important to re-examine the policies and methods of management that are applied to the converging technologies associated with the handling of information. The Department of Defense has acknowledged this trend by initiating a Long Range Automated Data Processing Planning Project. The project's focus is on the planning and need for general purpose, business and management information systems within the Department. Particular emphasis is given to areas and issues where impacts would be universally applied across DoD elements.

The major objectives of the overall ADP Long Range Planning Project are to:

- Provide DoD management with timely and meaningful information on technological projections to improve planning for systems support
- Promote the interchange of technology and impact assessment information among the DoD organizational elements

- Establish a precedent for the continued exploration of technological trends and innovation in achieving DoD missions.

Arthur Young & Company is under a task order agreement to support the Office of the Assistant Secretary of Defense, Comptroller, OASD(C), in this project by assisting the Directorate of Data Automation (DDA) in defining and conducting technology impact studies. The current study addresses the impacts on ADP in DoD of PL 96-511, which concerns paperwork reduction and information management in the Federal Government. The subject matter is particularly appropriate for the long-range ADP planning project because of its potential impacts DoD-wide.

## (2) Impact Study on the Paperwork Reduction Act of 1980

Arthur Young & Company was tasked by the Directorate of Data Automation to conduct an impact study of the Paperwork Reduction Act of 1980 (H.R. 6410/S. 1411 and passage of PL 96-511). The study effort was initiated in June, 1980 and concludes with delivery of this report.

The study provides a preliminary investigation of the impact of PL 96-511 on ADP in the Military Services and DoD Components and identifies specific issues for OSD focus and direction. The scope for this impact study is limited to automated information systems and the ADP arena. The study addresses both the impact of the Law on ADP in DoD as well as the impact which ADP may have on the other related areas addressed by the Act. While the study does, at times, address issues beyond ADP, the primary focus of the findings and recommendations nevertheless remains with automation. In particular, organizational issues raised by the Law are addressed only from the perspective of legal requirements and no specific recommendations concerning organizational structures in OSD or the components are offered. The study also places importance on the concept of information resources management (IRM) as it is strongly focused upon and embodied in the language and intent of the new Law. An understanding of this concept and the associated implications are addressed to assist OSD in its long-range ADP planning efforts. Also, the impact study delineates some of the implications for policy development that can be derived from this Law. Priorities are identified for OSD to consider in focusing future efforts which will enable OSD to respond to service and component needs more effectively as they address internal DoD requirements.

## 2. IMPACT STUDY OBJECTIVES

One of OASD(C)'s primary functions has been to provide guidance and direction to the various DoD components in ADP planning and management. In order to support OSD in this role, the impact study has been conducted in accordance with the following objectives:

- . To assess DoD program planning status in the areas addressed within the Paperwork Reduction Act of 1980 with particular initial emphasis on ADP and automated information systems
- . To clarify the role of OSD in addressing DoD Components' and Services' direction in response to the Law
- . To identify DoD priorities for implementation of the Law
- . To identify opportunities for future related impact studies that will prove beneficial to the Department of Defense.

The first objective of this study is to establish a baseline assessment of ongoing action within DoD related to various aspects of the Law. This assessment allows for identification of particular areas of concern to OSD for both near- and long-term reaction.

A key OSD function is to provide direction to the components in the planning and management of ADP. In order to continue this function as it applies to the implementation of the proposed legislation, OSL needs to be aware of the requirements of the services and other components. Therefore, a second objective of this study is to identify and define leadership roles for OSD to establish or expand regarding the automated information system requirements and direction embodied in the Law.

The Law encompasses several major areas associated with the IRM concept. Some people view it as primarily focused on paperwork reduction, while others view it from a larger information management perspective. Still others tend to focus only on the ADP system acquisition aspects of the legislation. Since it is in the interest of DoD to identify the major implications and key requirements most likely to be imposed, the impact study discerns these different focuses. The study objective of identifying a prioritized approach for responding to the legislation will help OSD plan for potential changes in areas of policy direction and operations.

Finally, the fourth objective of the impact study is to determine whether or not there will be need for additional studies related to the management of DoD's information resources. This study is intended to provide an overview of OSD's status with regard to implementing the law and to assist OSD in the development of policy and implementing directives and instructions.

### 3. STUDY APPROACH

The impact study effort undertaken by the Arthur Young & Company study team was intended to provide OSD with a preliminary review of the Law and its impacts on DoD. The study was not intended to investigate in great depth any single area of activity within DoD, but instead to identify at the policy and management levels, major aspects of ADP impacted by the Law. The impact study endeavors to established

a broad baseline of DoD's status regarding the legislation's requirements that can be used as a foundation for subsequent in-depth impact study efforts. The major elements of our approach for this initial impact study are described in the following paragraphs.

(1) Project Planning

To establish a framework for the study investigation, the study team identified key legislative documents to be collected and reviewed. In conjunction with the Directorate for Data Automation, the DoD organizations and activities whose missions and functions might be related to the purpose and intent of the legislation were identified. From this, selected organizations for prospective interviews were targeted. The various types of offices and individuals identified as candidates for interviews included policy makers, ADP managers, information managers, data standards managers, data administrators, implementation planners, and legislative support staff.

Structured interview guides were developed to allow identification of perceived implications regarding the purpose and focus of the legislation. A major intent of the interview process was to solicit perceptions concerning the extent of potential and ongoing implementation activities and to identify problems that may be associated in implementing the legislation. Particular areas addressed included information resource requirements, ADP system acquisition activities, ADP system requirements planning, and information management functions and activities.

(2) Data Collection

Once organizations for potential interviews had been identified, offices or individuals to be interviewed were selected, and an interview schedule was established with the DoD, Federal, and legislative offices shown in Exhibit II-1 at the end of this Chapter. Concurrent with conducting the interviews, documentation was collected from the interviewees as well as from other sources for review. This included documentation on relevant ongoing activities within DoD and the Federal Government, past related studies, letters of correspondence concerning the legislation and tracking Congressional activities concerning the passage of the legislation.

(3) Information Synthesis and Analysis

The following outlines the study approach to identification and assessment of issues, assessment of impacts and development of conclusions.

. Identification and Assessment of Issues

Information gathered from a review of the documentation and the interviews was synthesized to identify issues concerning implementation of the legislation. An analysis was conducted to identify and assess DoD's ADP and information policies as they relate to the guidance and direction contained in the legislation. In part, the assessment addressed major ADP and information management functions that exist within DoD to identify possible overlaps and to determine where potential problems may exist in coordination and direction of the legislation's implementation by the Department. A key aspect of this assessment was to identify requirements and responsibilities embodied in the legislation that are either currently undefined within DoD or out of compliance with the legislation.

. Assessment of Impacts

Major areas of impact of the legislation on ADP were identified. The study also addressed impacts that ADP may have on other areas covered by the legislation. The overall conceptual framework of information management policies, organizational structures and functions, as well as management tools were compared against major areas of ADP impact to identify priorities for OSD to consider in focusing future efforts and resources.

. Development of Conclusions

Conclusions and recommendations were developed regarding the legislative environment surrounding the bills in both houses of Congress. Benefits as well as problems attendant to passage of the legislation were identified in accordance with the bills' purpose and intent. The conclusions attempt to focus on the opportunities and challenges that DoD must address in complying with the provisions of PL 96-511. In developing the recommendations, particular attention was placed on identifying broad strategies to respond to the legislation's requirements.

4. CONCLUSIONS REGARDING THE STUDY EFFORT

Following the conduct of interviews, it became apparent that several conclusions could be drawn regarding the Components' and Services' perceptions of the study effort itself as well as the problems encountered and benefits gained by DDA from conducting the study. The findings presented in this section are not the conclusions or findings of the impact study but rather a description of the DoD community's reaction to the study effort.

(1) Organizational Setting and Individual Perceptions

The Components and Services contacted generally accepted the need for the study effort. This acceptance can in large part be attributed to the widely held view that OSD should take a lead role in developing an understanding of the issues involved. The study effort provided OSD with a higher degree of visibility and conveyed the general interest of OSD with implementing the proposed legislation. The Components and Services clearly appreciated the opportunity to have an input regarding this matter early-on.

During the course of the interviews, it became obvious that the study team was disseminating as much information as it was collecting. There was considerable interest in learning about the interpretations of the legislation as well as its progress through the Senate. The impact study was of benefit to DoD by providing a stimulus for the Components and Services contacted to begin focusing on the issues attendant to the legislation.

## (2) Problems Encountered

While the Components and Services contacted were aware of the bill's existence, few had made direct attempts to address the relevant issues in total. A notable exception to this is the Department of the Army which recently established an IRM office independent of any legislative impetus. The pace at which the bill was undergoing changes contributed to a general reluctance within DoD to apply a concerted effort to prepare for its passage. In addition, the overall atmosphere surrounding the bill's progress was emotionally charged regarding the scope of and purpose behind the legislation.

Several of the Components and Services contacted were particularly concerned with regard to aspects of H.R. 6410 regarding the ADPE acquisition process. Much of the language and focus of the legislation that gave rise to these concerns was subsequently amended in the Senate version (S. 1411). Regardless, interviewees continued to be particularly skeptical towards the legislation's potential impact on ADPE acquisition and the ADP life cycle. The continued focus on ADPE acquisition by some elements contacted made it more difficult in these instances to address the broader ADP issues and measures supported by the legislation.

Conversely, areas peripheral to the ADP focus (and thus outside the study scope) were repeatedly addressed by many interviewees. It would have been inappropriate to ignore these areas due to their impact on the overall issues of the Act, and so the interviews were broadened at the interviewees' initiation to allow for expanded discussion in non-ADP areas (such as information management, standardization, information requirements and control, and records and forms management) which were of particular concern to those contacted. Findings that had ADP related impacts have been included in the study report.

A further problem occurred in restricting the interviews from organizational issues. A common occurrence was for an interviewee to focus not on what functions would need to be performed under the Law but on who should do it. No recommendations about organizational placement of responsibilities have been made in the report.

### (3) Benefits Gained

The impact study served to emphasize the bill's importance to the Components and Services and provided focus on the attendant issues. Furthermore, the study provided an opportunity to re-emphasize the need for a strong relationship between the ADP community and the other information management activities.

As a result of the study OSD is perceived as taking a leadership role in preparing for enactment of the legislation and in examining emerging information resource management concepts. The study was well-received in large part due to the perception that OSD was displaying a sensitivity for Component and Service concerns and needs.

Finally, the study stimulated communication and interaction among OSD, the Components, and Services that might not have otherwise occurred. These discussions may serve as fertile ground for identifying future impact study topics under the long-range ADP planning project and generating interest in the overall conduct of such studies.

The Paperwork Reduction Act can have an important impact on information management and ADP in DoD. The following chapter provides a description and analysis of the evolution and elements of PL 96-511. In Chapter IV DoD's current policy and functions that relate to concepts supported by the Law are described and analyzed. The final chapter presents overall conclusions, impacts, and recommended implementation strategies.

EXHIBIT II-1

ORGANIZATIONS CONSULTED DURING THE STUDY

(1) Department of Defense

- . Office of the Secretary of Defense
  - Data Automation
  - Management Information Control and Analysis
- . Defense Logistics Agency
  - Comptroller's Office
  - ADPE Replacement Program Office
  - DOD Log Data Element Standards & Management Office
  - System Division
- . Defense Intelligence Agency
  - Resources & Systems Advisory Group
- . Defense Communication Agency
  - IRM Group
  - Comptroller's Office
  - ADP Service/Policy
- . Defense Mapping Agency
  - Data Automation Division

(2) Military Services

- . Air Force
  - Office of the Secretary of the Air Force, Financial Management
- . Navy



- Special Assistant for ADP Policy
- Command & Control - Information System Policy & Planning
- Naval Data Automation Command
- . Army
  - Office of the Assistant Secretary of the Army (IL & FM)
  - IRM Task Force
  - The Adjutant General's Office
  - Management Information and Control

(3) Federal Agencies

- . General Services Administration
  - Automated Data Processing and Telecommunication Service
  - National Archives and Records Services, Office of Program Development, Technology Assessment Division
- . Office of Management and Budget
  - H.R. 6410 Task Force
  - Senior Staff Officials for Information Policy and Reports Management in OFIRA
  - Former OMB Senior Staff
- . Department of the Interior
  - Office of Information Resources Management
  - Former Senior Staff
- . Department of Housing and Urban Development
  - Management Systems & Studies
- . Department of Education
  - Office of Legislation

- . Department of Transportation

- Former Senior IRM Staff

(4) United States Congress

- . House of Representatives

- Government Operations Committee Staff

- . United States Senate

- Governmental Affairs Committee Staff

### **III.**

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#### **FEDERAL IRM AND THE EVOLUTION OF PL 96-511**

### III. FEDERAL IRM AND THE EVOLUTION OF PL 96-511

In this chapter we present a discussion of the Federal information environment and relevant background leading to the Paperwork Reduction Act of 1980, as well as key elements in the Law. At the outset, it is important to note that while the title of the Act obviously stresses paperwork reduction, the content of the Law addresses the general problem of information resource(s) management and issues that focus on areas well beyond the simple reduction of paperwork in the Government. In fact, there is a dual focus on both ADP as well as on manual records and data collection. That ADP is a key aspect of provisions in the Law is clearly illustrated by specific references in both the Committee reports as well as in the legislation itself to already enacted legislation regarding ADP which includes the Brooks Act of 1965 and the Privacy Act of 1974, as well as Executive Orders issued by the President concerning information management. Exhibit III-1 is a brief synopsis of some key efforts to control paperwork and to formulate ADP policy and direction in the Federal Government beginning with the Cockrell Committee of 1887. The exhibit demonstrates the recurring frequency with which the Federal Government has attempted to address the problem of paperwork, ADP, and information management.

The discussion of the background of the legislation in this chapter is followed by a summary of the highlights of the Law. The chapter concludes with a discussion of information resources management and its relation to the legislation.

#### 1. BACKGROUND LEADING TO THE BILL

The history of the Paperwork Reduction Act of 1980 can be logically divided into two significant periods: the pre-Federal Reports Act period before 1942 and the period following that landmark legislation to the present. While the Federal Reports Act of 1942 is generally used by modern researchers as the base point from which to trace paperwork and redtape reform efforts, significant reform efforts which pre-date that landmark legislation are worth reviewing briefly in order to present a fuller picture of the historical background leading to H.R. 6410 and S. 1411 in the 96th Congress.

##### (1) Pre-Federal Reports Act Reform Efforts

In 1887 the Cockrell Committee was charged with reviewing the high cost of copying in Government and making recommendations to reduce those costs. Then in 1893 the Dockery-Cockrell Commission studied the increasing use of carbon paper and letter presses, which were beginning to proliferate in government agencies. In 1905, in response to criticism that there was no

A BRIEF SYNOPSIS OF FEDERAL INFORMATION MANAGEMENT ACTIVITIES

<u>Name of Reform</u>	<u>Year</u>	<u>Primary Thrust</u>
Cockrell Committee	1887	High Cost of Copying
Dockery-Cockrell Committee	1893	Carbon Paper and Letterpresses
Keep Committee	1905	Filing; Established National Archives
Taft Commission	1913	Economy and Efficiency in Government
Central Statistical Board	1933	Coordinate Statistical Gathering
Federal Reports Act	1942	Clearance Controls over Public-Use Reports
1st Hoover Commission	1949	Better Organization for Records Management
Federal Records Act	1950	Agency Records Management
2nd Hoover Commission	1955	Ways to Reduce Paperwork and Costs; Some Systems Improvements
Brook's Act (PL 89-306)	1965	Federal ADPE Acquisition
Paperwork Jungle Hearings	1965	Burden on Taxpayer and Red-tape in Government
Paperwork Burden Hearings	1972	Burden on Taxpayer and Red-Tape in government
Privacy Act	1974	ADP controls and Privacy of Information
Commission on Federal Paperwork (CFP)	1975	Information Resources Management
President's ADP Reorgani- zation Project	1977	ADP Management
Reorganization Plan 1 of 1977	1977	Telecommunications

EXHIBIT III-1

Page 2 of 2

Executive Order 12174

1979

Information Collection Budget  
Federal Information Locator  
System

Paperwork Reduction  
Act of 1980

1980/81

Strengthen Reports  
Clearance; Better Use  
of Information Technologies

central focal point in government to prescribe policies and develop good records and archives management practices, Congress established the Keep Committee. Its most memorable achievement was to recommend the establishment of the National Archives. While the primary focus of the Keep Committee was centralization of official U.S. Government documents, its report also expressed concern about what later would come to be called "administrative" records -- documents which were routinely generated by the Cabinet and agencies that were not necessarily "archival" in importance, but nonetheless constituted an important tool for auditors, historians, and writers doing research.

In 1913 Congress departed from its earlier thrust of looking at "paper, printing presses, and pencils" and, for the first time, decided that a broader look was needed of Government efficiency and economy. Under President William Howard Taft (1909-1913), a Commission was set up to address these issues. While the goals and ambitions of the Taft Commission were notable, unfortunately the scope and quality of its investigations and, ultimately, its recommendations were deficient. It was to be left to the two subsequent Hoover Commissions to complete the tasks the Taft Commission had begun.

In 1933 President Franklin D. Roosevelt created, by executive order, the Central Statistical Board acting under the emergency powers of the National Industrial Recovery Act. The economic depression of the 1930's not only spawned new agencies and new programs with new demands for information, but also generated pressures for economy in Federal expenditures. The Board was conceived as an instrument for coordinating information requests and minimizing wasteful duplication on the part of agencies carrying out the purposes of the Act.

In 1934, another executive order provided that the Central Statistical Board should have a chairman appointed by the President and gave broader scope of its jurisdiction. Its work still was linked to the purposes of the National Industrial Recovery Act, but now it would be "concerned with all statistical services in the United States" which might be useful for those purposes, and with those conducted by non-Government, as well as Government agencies. The Board was to plan and promote the development as well as the improvement and coordination of statistical services, aiming toward economy and the elimination of unnecessary duplication. Its appraisal and review functions were strengthened by authority to investigate statistical services and to have access to the papers, reports, and records of each Federal agency concerning existing or proposed statistical work. However, findings and recommendations were to be published only with the consent of the agency concerned.

Retrospectively, President Roosevelt commented on the rationale for creation of the Board and its broadened powers by

expressing concern that conflicting statistics relating to the same subject were being published by two or more departments or agencies and that there was duplication in statistical research. The Central Statistical Board was intended to eliminate both of these defects in administration.

The optimistic expectations associated with the new Board did not seem to materialize, however. President Roosevelt became sensitive to complaints from businessmen and farmers about the great number and duplication of reports they were required to return to the Federal Government, complaints which seemed to be more numerous after the business recession of 1937. The President conferred from time to time with Stuart A. Rice, the chairman of the Central Statistical Board, and then, in May 1938, sent him a letter directing an investigation into the large number of statistical reports which Federal agencies were requiring from business and industry. The President requested to know the extent of such reports and how far there were duplication among them. The Board was directed to report to the President on the statistical work of the Federal agencies with recommendations looking toward consolidation and changes which were consistent with efficiency and economy, both to the Government and to private industry.

#### (2) The Federal Reports Act of 1942 - A Key Landmark

Repeatedly since 1887, the Congress and Presidents made several attempts to address the problem of excessive paperwork and information collection by the Government. But in most cases (with the possible exception of the Taft Commission and the Statistical Board), these committees, boards, or laws attacked the symptoms of the problem: the actual paperwork itself rather than the causes of paperwork: the inefficient ways in which Government collects, processes, uses, and supplies information.

In 1940 public annoyance over the Government paperwork problem reached a new zenith and the Senate established a Special Committee to study problems of American small business. Legislation was developed as a result of this Committee's recommendations and the Senate Small Business Committee unanimously recommended the legislative proposal be favorably considered. The bill was introduced by Chairman James Murray as S. 1666 and referred to the Committee on Education and Labor. In its hearings, the Committee concluded that with the advent of the Second World War, vast quantities of additional facts were needed by the administrative agencies, since almost all the measures adopted to activate the war programs required paperwork. The Government's billions of dollars of war work could not have been accomplished without a tremendous increase in the number of forms. The allocation of materials and manpower, production controls, price control, selective service, and many other policies all required the assembly and use of facts which would permit the



executive agencies to carry out their duties. In the absence of adequate review and screening devices, business concerns and others were overwhelmed by paperwork. It was almost a daily occurrence to receive some new request from Washington. Many of these requests to a greater or lesser degree duplicated each other and many of them showed no evidence of having been carefully considered.

S. 1666 passed the Senate on November 23, 1942, toward the close of the 77th Congress. Representative Wright Patman of the House Small Business Committee, had in the meantime introduced H.R. 7756, embodying the text of the Senate-passed bill. In the House floor debate a significant exchange occurred between Rep. Case (S.D.) and Chairman Whittington of the Committee on Expenditures in the Executive Departments, who managed the bill on the House floor. Rep. Case noted that in OPA, and particularly WPB, there were a large number of dollar-a-year men with loyalties divided between Government and their businesses, and easy access to Government information might afford an unfair competitive advantage to these individuals. The Chairman's answer was that such information could already be obtained and that the bill actually would restrict it. He added the opinion that, in the interest of efficiency and economy, if any agency of the Government obtains information that is essential to the functions of Government, it ought to be made available to another agency of the Government, but not in violation of law or by giving to the public any information that is prohibited by law from being given to the public. A conference was held on December 10, 1942. Both the House and Senate adopted their report and the House quickly passed the bill and sent it to the President who approved it on December 24, 1942, becoming Public Law 77-831, the Federal Reports Act.

The Act, codified in Title 44 of the U.S. Code, starts with a congressional declaration of purposes, which are:

- . To obtain information with a minimum burden on business, especially small business, and on other persons required to furnish information
- . To obtain the information at minimum cost to the Government
- . To eliminate unnecessary duplication as rapidly as practicable
- . To tabulate the information to maximize usefulness to other Federal agencies and the public.

Central reports management powers were invested by the Act in the Director of the Office of Management and Budget who is to:

- Investigate the needs of Federal agencies for information from persons (including business enterprises) and from other Federal agencies;
- Investigate the methods used by the agencies in obtaining information; and
- Coordinate as rapidly as possible the information-collecting services of all agencies with a view of reducing cost to the government of obtaining information, minimizing the burden upon business enterprises and other persons, and using, as far as practicable, for continuing organization, files of information and existing facilities of established Federal agencies.

Under the Federal Reports Act the Director is empowered to determine whether the collection of information by a Federal agency is necessary for the proper performance of its functions. The determination may be made upon the request of a party having a substantial interest, or upon the Director's own motion. He may, at his option, extend an opportunity for the agency and other interested persons to be heard or to submit statements. If the Director determines that the collection of information is unnecessary, the agency is forbidden to engage in the collection. The Federal agency may not collect official information from ten or more persons, other than agencies and Federal employees (in their capacity as employees), unless the plans or forms are submitted in advance to the Director, together with pertinent regulations and related materials, and the Director has stated that he does not disapprove the proposed collection of information.

The Director is also empowered to designate a central collecting agency after investigation and hearings, if he decides that the needs of two or more Federal agencies will be adequately served by a single collecting agency. The hearing is a prerequisite to the issuance of an order designating a single agency. The order is to prescribe the duties and functions of the collecting agency and the Federal agencies for which it is to act as agent. The order may be modified as circumstances require only after additional investigation and hearings.

### (3) The Commission on Federal Paperwork

In the late Sixties and early Seventies the Congress found that as in the instances of the Central Statistical Board and the Federal Reports Act of 1942, their paperwork reform attempts appeared not to be working and a renewed effort was needed. Once again, it was the concerns and protests of the small businessman, the farmer, the trucker, and individual proprietor that were heard loudest in Congress. In answer to these concerns the 93rd Congress enacted Public Law 93-556 (88 Stat. 1789), again codified in Title

44 (this time Section 3501), on December 27, 1974, which created the Commission on Federal Paperwork.

In its declaration of purpose the Congress said:

"The Congress hereby finds that Federal information reporting requirements have placed an unprecedented paperwork burden upon private citizens, recipients of Federal assistance, businesses, governmental contractors, and State and local governments; and the Congress hereby affirms that it is the policy of the Federal Government to minimize the information reporting burden, consistent with its needs for information to set policy and operate its lawful programs; and the Congress hereby determines that a renewed effort is required to assure that this policy is fully implemented and that it is necessary to re-examine the policies and procedures of the Federal Government which have an impact on the paperwork burden for the purpose of ascertaining what changes are necessary and desirable in its information policies and practices."

The Commission on Federal Paperwork (CFP) was charged with studying and investigating statutes, policies, rules, regulations, procedures, and practices of the Federal Government relating to information processing, gathering, and dissemination, and the management and control of these information activities. The Commission was then to ascertain what changes are possible and desirable in existing statutes, policies, rules, regulations, procedures, and practices relating to Federal information activities, and to make a final report to the Congress and the President within two years of the date of the first meeting. The Office of Management and Budget was then directed to follow-up on the recommendations of the CFP for two years following submission of its final report.

The CFP identified ten deficiencies of the Federal Reports Act of 1942:

- . The Act does not cover all agencies of the Federal Government; less than 20% of all government requests actually go through the reports clearance process (e.g., IRS forms are exempted)
- . There is split jurisdiction between OMB and the GAO (which was given reports clearance authority in 1973 for the regulatory commissions such as FTC, FCC, etc.); GAO's authority over regulatory information gathering was rather limited compared to OMB's authority over all other agencies, thus leading to confusion and ambiguity in policies and procedures for the Federal Government as a whole.

- . The Act is not clear on its coverage of a major portion of the paperwork burden, recordkeeping, although recordkeeping is covered by OMB Circular A-40 (which implements the Act by prescribing more detailed and specific operating procedures); citizens and businesses complain as much about having to set up and maintain unnecessary records as they do over preparing reports and forms to send into government
- . Not all agencies covered by the Act comply fully with its requirements; in public hearings various respondents said they have received forms without an OMB clearance number and had been harassed by agencies to submit the information anyway
- . The clearance process comes into play after agency planning for information collection has been virtually completed, report formats have been developed, and the pressure for program execution is acute; at this stage, the leverage of the OMB (or GAO) central clearance unit to question information requirements is considerably reduced
- . The clearance process tends to be adversarial in nature and can be an extremely slow process; clearance by OMB moreover, is required for reporting requirements of little or no significance
- . OMB has never exploited fully the potentials of the Act; it has not developed a file of existing information so that the possibility of duplication could be checked; nor, except in the case of using statistical methodologies has it undertaken research and investigations on how the quality and usefulness of data collections might be improved
- . The OMB has not allocated sufficient resources in manpower nor given enough top management attention to the administration of reports clearance
- . The Act does not recognize the responsibilities of individual agencies for information collection, nor make explicit their role in developing information requests
- . Most importantly, the Act does not deal with the causes of Government information requirements; the decisions made about how programs are to be run; and what factors contribute to paperwork and redtape.

In his final report to the President and the Congress submitted on October 3, 1977, Commission Chairman Frank Horton (R.,N.Y.) had this to say:

"Many people feel, and the Commission agrees, that a multi-billion dollar wall of paperwork has been erected between the Government and the people.

Countless reporting and recordkeeping requirements and other heavy-handed investigation and monitoring schemes have been instituted based on what we view as a faulty premise that people will not obey laws and rules unless they are checked, monitored, and rechecked. This situation and this assumption must be reversed if we are to restore efficiency within Government and confidence in Government by the people and if we are to realize the potential for cooperative attainment of our goals as a Nation. Many of our major conclusions and recommendations are aimed at this goal. In essence we seek three things: (1) a substantial reorganization of Government administrative and management machinery which affects the Federal paperwork process; (2) a new philosophy so that rules, laws, and regulations are made in context of true consultation and participation with the people; and (3) a continuation and expansion of effort to cut paperwork which has already been mounted by the Administration."

The Commission made over 770 recommendations, contained in 37 separate reports. Perhaps the most important of these were the recommendations concerned with articulating a new information management doctrine which the Commission called Information Resources Management (IRM). In a key section in its IRM report, (September 9, 1978, pp. 8-9) the Commission said:

"As one authority put it, until fairly recently paper was the primary medium of all organizational information flows; thus, paperwork management was synonymous with information management. By and large, information flowed through the organization on paper -- it was compiled on paper, recorded on paper, manipulated on paper, stored and retrieved on paper, and disposed of and destroyed on paper. It was reasonable to assume that controlling the medium of information flow through forms, records, reports, microfilm, and the like, was the same as controlling the flow of information itself. But the reality of yesterday is no longer. Where information once flowed primarily on paper, it now flows on electrons. It's 'half life' is becoming increasingly shorter and shorter, and smaller and smaller quantities are 'recorded' in traditional documentary forms. Over the past twenty years, advancements in information handling technologies have substantially increased the Government's ability to collect and process data into information products and services. From the basic computer we have witnessed the evolution of a whole family of information machines, large and small, powerful and flexible. Through its efficiencies, this technology has offered a steady

decrease in the unit cost of handling data; more data can be handled at less cost per unit than was possible twenty years ago. This, however, fosters a deceptive view of the economy of computers (and telecommunications equipment and other related information technologies such as copying machines and word processing equipment), because the total costs (of all of this hardware and software) have increased (because 'everybody wants his own machine.') ...In short, the paperwork management programs of the past are unable to control the data explosion engendered by the computer and communications breakthroughs. A simple bureaucratic reorganization of traditional records and paperwork management disciplines to meet the challenges of the information revolution would simply be overwhelmed in attempting to control the mass of complexity presented by modern computer/ telecommunications technologies."

And in the central sentences (pp. 11, 12):

"But the problem of information overload in an agency is not just a 'how to' problem, it also involves 'what' and 'why' problems. That is, the questions that are raised by the concern with information collection, use, and value touch not only the procedural problems of how information collection can be more efficiently collected, stored, processed and disseminated, but also the substantive problems of why information is collected and used the way it is, what value it has in the success of an organization's programs and missions. Although the term 'paperwork management' has been around a long time and is readily understood in a general sense by almost everyone, the Commission found that the term 'information resources management' more accurately describes what should be the main target of control machinery. That is, the target should be on information requirements planning, information budgeting, information accounting, and information controlling, not simply the physical medium of paperwork (or microfilm or digital media for that matter). The media are, after all, just the carriers of information; it is the information content that is of crucial importance."

The Paperwork Commission concluded that the real culprit of the Federal paperwork and redtape burden was not the physical paperwork per se, or any information carrier medium for that matter, but rather the tendency of Government to look upon information as a "free good". In this regard, the Commission concluded that, generally, in the Federal Government information

requirements are not carefully planned, nor are procurements between related information technologies carefully coordinated (e.g., between computers large and small, main frames versus distributed systems, telecommunications and the mail room tie-ins, word processing equipment, and copying machines), nor are concerted attempts made to assess whether or not the value Government receives from using its information for decision-making and problem-solving actually equals or (ideally) substantially exceeds all of the costs involved in collecting, handling, disseminating, and disposing of (unneeded) information holdings. The three most important IRM-related Commission recommendations intended to implement an IRM concept in the Government were:

- . Congress and the President should set as policy the institution of IRM, and should establish the necessary guidance, tools and other machinery to implement the policy on a Government-wide basis and in individual agencies
- . The President should consolidate the major paperwork, information and communications-related policy oversight functions and authorities which are now dispersed and fragmented, under the direction and leadership of a central management policy unit within OMB
- . The President should strengthen, clarify and coordinate the major paperwork, information and communication-related operating functions and responsibilities, as well as policy development functions now dispersed and fragmented among many different departments and agencies, under the direction of a single, central management authority. The relevant functions and authorities include:
  - The functions of Commerce and NBS under P.L. 89-306 (the Brooks Act), including the ADP standards functions
  - Government-wide ADP and communications-related operating responsibilities of OMB (then located in OMB's Information Systems Division)
  - Government-wide operating responsibility for the Federal Information Locator System (the central file or index of information planned to be collected, or already collected, by all federal agencies)
  - Government-wide statistical operating responsibilities of OMB (which were later transferred to Commerce after the Commission's report was released)
  - The records management program of the National Archives and Records Service (NARS)

- Operating responsibilities of the National Technical Information Service (NTIS) (housed in Commerce)
- Government-wide ADP and communications-related operating responsibilities of GSA
- Various Government information center programs such as the Federal Information Centers of GSA, the Business Service Centers program of GSA, and the Job Information Centers program of OPM.

These recommendations crossed significant jurisdictional lines since the above list of policy and operating responsibilities was dispersed and diffused both at the Government-wide level in both branches of Government (Executive and Legislative) as well as within the same department or agency where these functions typically resided in different offices. In short, the Paperwork Commission had moved away from the traditional paperwork function and squarely attacked the problem of coordinating information-related functions wherever they might be organizationally housed.

(4) The Brooks Act (P.L. 89-306)

The Brooks Act gives GSA, along with OMB, a central management role to ensure that the Act's objectives are met. It establishes a framework for the central management and procurement of the Government's automatic data processing (ADP) resources. OMB is assigned policy and fiscal authority under the action, and GSA is granted operational responsibilities. Specifically, the chief provisions of P.L. 89-306, dated October 30, 1965, are as follows:

- . The Administrator, GSA is authorized to provide for the acquisition and maintenance of automatic data processing equipment (ADPE);
- . The Administrator can transfer ADPE among agencies
- . An ADP fund is established to be managed by the Administrator
- . The Administrator may delegate procurement authority to agencies in the interest of economy and efficiency or when such action is essential to national defense or national security
- . The Administrator's authority is subject to fiscal and policy control of OMB
- . The Administrator cannot impair or interfere with agency ADPE requirements determinations.



The relevancy of the Brooks Act to the Paperwork Reduction Act of 1980 might best be explained by noting remarks made by Comptroller General Staats in his letter to Senator Chiles dated July 25, 1980, as part of the Senate Governmental Affairs Committee's hearings on S.1411. General Staats said at one point:

"The present situation in ADP is characterized by: the confusion of policy roles between OMB and GSA; overly complex and costly software that too often fails to meet user needs, is inefficient, or simply does not work; and a costly, prolonged, and ineffective acquisition process which too often emphasizes hardware characteristics over sound financial investment. The bill (S.1411) reemphasizes the principles contained in the Brooks Act for strong oversight and management of the acquisition and use of ADP resources. The functions assigned to OMB, GSA and the Department of Commerce under the Brooks Act are not changed. However, by reemphasizing the Brooks Act, the bill attempts to strengthen the leadership and central direction provided by these agencies. Further, the consolidation within OMB of policy-making and oversight responsibilities for the other information management functions covered by the bill should enhance the capability for applying advanced information technology to the problems of controlling paperwork burdens and improving the quality of data for program management and evaluation."

Phillip J. Kiviat, a key member of the President's Federal ADP Reorganization Project team, testified before Chairman Brooks' House Government Operations Committee on February 7, 1980, when it was holding hearings on H.R. 6410, and drew a somewhat different kind of relationship between the Brooks Act and H.R. 6410. He said:

"Hundreds of millions of taxpayer dollars have been wasted or lost through mismanagement and misuse of computer resources that prompted the President (Carter) to establish the Data Processing Reorganization Project. There was suspicion that despite the high level organizations mandated by Public Law 89-306 (The Brooks Act) to oversee and manage it and despite the considerable funds being spent (\$3.1 - 5.3 billion in FY 1976), the Nation was not getting its money's worth; the government was using its computers ineffectively, and the situation was getting worse rather than better as time went by. The Office of Information Policy established by H.R. 6410 will be the managerial focal point called for by (our) project. H.R. 6410 adds

substance, specificity, and vigor to the present vague, formless, and aimless ADP management system. I believe I reflect the sentiments of the DP Reorganization Project in saying that the bill furthers the ends advocated by the project's final report, and that it does so through means consistent with those the project advocated."

Finally, the statements of Frank J. Carr, Commissioner of Automated Data and Telecommunications service at GSA, add still a third dimension to the relationship between the Brooks Act and the Paperwork legislation. At the same H.R. 6410 hearings at which General Staats and Mr. Kiviat testified, Mr. Carr said:

"There is a major problem we have in the acquisition and utilization of computers. The cost of hardware has steadily been going down. The cost of system development software had steadily been going up. The problem in the cost conversion from old systems and old computer equipment to new has been a major problem that we have been faced with. (In this regard) H.R. 6410 provides for the development and implementation of comprehensive federal policies, principles, standards, and guidelines. One of the things you find when you start to look at this area is that you have a large number of divergent and competing interest groups. You have the data processors, the statisticians, the word processors, records managers, designers of reports and questionnaires, communication specialists, office managers, and I am sure we could add others to this list. One of the major benefits of this legislation (H.R. 6410) is that it is bringing together all of the separate interests in a focused manner. That, by the same token, is one of the problems that will have to be faced in implementing the bill because there is a tendency to resist this bringing together. In conclusion, Mr. Chairman, let me repeat this. H.R. 6410 addresses many longstanding problems. It focuses Government-wide information policy and standards into a single focal point. It will make the practices and procedures of each agency prominent. It requires high level attention to both internal efficiency and the paperwork burden on the public. It gives added impetus to the programs of GSA, particularly ADTS, to achieve its responsibilities under the Brooks Act. I would like to point out, Mr. Chairman, going back to the original passage of the Brooks Act, the legislative history shows that the decision was made not to statutorily define ADP equipment. The reason for that was the feeling that we really did not understand what the future changes would bring in the marketplace. Since that time, there has been a significant change in

the market. There have been things like proprietary software programs and teleprocessing services and many additional ways in which agencies can satisfy their ADP requirements. The Brooks Act established a framework within which the Federal Government could address the new means of satisfying its requirements. Similarly, H.R. 6410 has to be viewed in that light. It provides a management system that should not only help us to solve the problems that we cannot define today, although we are sure to be faced with them in the future."

The controversy over just what the precise relationship was between the Brooks Act and the Paperwork Reduction legislation, however, carried through to the final hours of negotiations concerning the passage of S. 1411 and resulted in some explicit statements in the Law.

(5) The Federal Records Act of 1950

ADP and communications can be considered the first of the information and paperwork-related functions which the Paperwork Commission wanted consolidated into a broader, information resources management function. Records management might be considered the second area. When the first Hoover Commission on Reorganization of the Executive Branch of the Government was established in 1948, Federal records holdings totaled 18.5 million cubic feet. The Federal Government was spending more than a billion dollars a year on recordkeeping. Recognizing the possibilities of achieving significant savings on this costly activity, the Hoover Commission set one of its 24 task forces to study the problem. The task force report, published in January 1949, made an impressive case for records management as a discrete administrative function in Federal agencies and for the Government as a whole. Citing numerous statistics analyzing the needlessly high cost of records, the causes of this condition, and the burden on the American taxpayer, the task force recommended that a Federal Records Management Act be enacted, establishing comprehensive legal authority for the creation, preservation, management and disposal of U.S. Government records.

Under the Federal Records Act of 1950, the General Services Administration is responsible for developing and improving standards, procedures, and techniques regarding the creation, organization, maintenance, and disposition of records. The GSA is responsible for establishing and operating Federal records centers, as well as the National Archives, and evaluating the effectiveness with which agencies manage their records. Vesting of records management in GSA/NARS, however, did not relieve other agencies of records management duties under the Act.

At the urging of the Commission on Federal Paperwork, as well as various Congressmen and Senators, Congress amended the

Federal Records Act of 1950 (by Public Law 94-575) and put forward an expanded definition of the term "records management." Under the amended Act, the term now means "the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, maintenance and use, and disposition." Operating the 'life cycle' of records, NARS is authorized to intervene in the records management practices of all Federal agencies. None are exempted from records management supervision and control. NARS must also make annual progress reports to the Congress and to OMB concerning results of program activities and the progress of Government agencies.

The Commission on Federal Paperwork made eight recommendations in the records management area.

- . NARS should introduce the concept of IRM with the view of shifting attention to the data content of records and forms, instead of the traditional focus of records/paperwork management
- . GSA and GAO should take a fresh look at the reimbursable technical assistance program in the light of current NARS priorities and efforts to reorient the program (the CFP had alleged that too high a proportion of critical NARS management leadership was siphoned off into relatively low level, low priority RTA activities)
- . The to-be-created new information management policy office in OMB should undertake a broad-based research program into all areas of IRM and related paperwork activities
- . The same above office should set records management program performance standards and perform agency evaluations; should develop, promote and enforce procedures for agency self-evaluations; and should establish a schedule whereby major departments and larger independent agencies are evaluated at least once every five years
- . OPM, NARS, and the USDA Graduate School should undertake a joint project to consolidate, revise, and update records management workshops and other courses on similar or related subjects so as to produce a single up-to-date series of workshops using the latest teaching methods and IRM concepts
- . NARS should revise existing handbooks as appropriate, to reflect the IRM concept; should issue new handbooks and guides covering such subjects as new approaches to IRM, reports management, word processing management, and related topics; and should include in new handbooks guidelines to assist agencies in implementing programs of their own

- . Congress should amend existing statutes to give NARS authority to monitor and advise Federal agencies on the retention schedules they set for records that must be kept by State and local governments, industry and the general public (this authority is to be contrasted with authorities already retained for U.S. Government official records, or 'federal records' as they are commonly called)
- . NARS should assign higher priority to its program of technical assistance to State and local governments, emphasizing the adoption of IRM concepts in addition to helping to resolve specific procedural and informational problems.

Frances E. Fuller, Chairman of the Legislative Affairs Committee of the Association of Records Managers and Administrators (ARMA) testified before Chairman Brooks' H.R. 6410 hearings on February 26, 1980, and had this to say concerning the relevance of H.R. 6410 to private sector records management practices:

"We believe that the objectives of H.R. 6410 address for the first time and create the basic authorities and accountabilities to exercise badly needed control over the reporting and recordkeeping regulations which have become a \$100 billion a year burden to the private sector. No cost equation is complete without the factor of retention and storage costs. Every company in the U.S. has space that it uses exclusively for this purpose. It is not unusual to find companies paying as much as \$60,000 a year to store records needed to comply with the requirements which affect their organization. Storage costs are often a hidden factor, not recognized when computing reporting requirement compliance figures. A major problem is the often vague or ambiguous nature of the regulations themselves. If the Administrator of the Office of Federal Information Policy could accomplish only one thing, in our opinion, it should be to simplify and clarify the recordkeeping and retention period regulations. Because retention periods are often unspecified, vague, or difficult to determine, we are put in the position of having to keep too many records for too long. We are hopeful that the Federal Information Locator System can be used to address this problem. We are especially hopeful that the index will include specific retention periods."

(6) The President's Reorganization Project

The Federal Data Processing component of the President's Reorganization Project submitted its final draft report in December of 1978. The project was initiated to examine the ways in which the Federal Government acquires, manages, and uses data processing technology and to make recommendations regarding:

- . Improvement of the delivery of services through application of computer and telecommunications technology
- . Improvement of the application and management of the relevant resources
- . Elimination of overlap and duplication in agency jurisdiction relative to ADP issues
- . Improvement of the productivity of the Federal data processing work force.

The work was carried out by several independent study teams. The study group made an early decision that the term "data processing" does not adequately reflect the convergence of the computer and communications technologies, and is typically associated only with administrative record keeping functions. The broader term "information technology" was subsequently chosen as the primary descriptor for the object of the study. The study team developed detailed findings in each of their study areas. From these findings a consensus of conclusions were developed that expressed the following:

- . The Federal Government must establish criteria for measurement of mission performance and reward as well as build upon competence
- . The central agencies of the Federal Government must revitalize and rechannel their management efforts in a way that will cause more effective use of information technology
- . The current condition of the Government in general will not improve without major changes in attitude regarding information technology. A systematic and energetic effort will be required to effect needed changes. This effort will require a commitment enumerated and driven by the President.

Nine recommendations were presented that represent a consensus developed from the common themes which emerged from the efforts of the independent study team. They are:

- . The Federal Government needs to take action that will establish the importance of information technology, provide tools for its management, and set national and Federal goals for its productive use

- . The Federal Government needs to improve and expand its use of modern information technology to increase and enhance the level and quality of governmental service delivery while reducing costs
- . The Office of Management and Budget needs to establish a policy requiring that costs of data processing be charged back to the using agency and program, in program-related terms
- . The Federal Government needs to set as an objective the removal from service of all information technology components which have outlived their cost-effective life
- . The Federal Government needs to significantly alter its process for acquiring information technology resources. Increased emphasis should be placed upon the planning, needs definition, and justification phases of acquisition
- . The Federal Government needs to upgrade the training and career development required for functional managers, reclassify personnel skilled in the management or use of information technology, and establish appropriate career paths for such persons
- . The program and mission agencies need to be strengthened to meet the general requirements for managerial and technical expertise in information technology. The agencies must have prompt access to resources which can help them solve their problems
- . The Federal Government needs to institute a research and development program in information technology to meet the needs of the non-defense sector
- . The Federal Government needs to revitalize its efforts to establish and maintain a standards program for information technology in order to support the economic purchase of equipment and the economic and effective operation of computer resources.

Specific recommendations concerning the management of information technology in the Department of Defense were developed by the National Security Team. Key aspects of these recommendations are summarized as follows:

- . Top level DoD management should involve itself in the resolution of the current computer resources dilemma
- . An OSD-level executive should be charged with overseeing the entire spectrum of use of the information technology program including applications supporting administrative, scientific command and control and operations functions

- . Initiatives in the areas of life cycle management, career development, long-range planning, Congressional relations, and budgeting and cost accounting should be promptly implemented
- . Establish information technology career fields which will allow progression into top management levels
- . Simplify and streamline approval and acquisition procedures
- . Develop and implement a "charge-back" system for automation expenditures
- . Adopt and enforce life cycle management policies which implement OMB Circular A-109 policies
- . Strengthen the capability and role of the Defense Audit Service in reviewing ADP projects and requests.

It was the overall conclusion of the project team that the serious management problems identified would require extensive attention through implementation of the above recommendations to ensure that the effectiveness of Defense computer support is returned to the highest practical level.

(7) The Federal Information Locator System and Executive Order 12174 on Paperwork

As mentioned earlier, the Act which established the Paperwork Commission required OMB to follow-up on the status of the Commission's recommendations for the first two years following the submission of its final report. On June 24, 1978, OMB Director James T. McIntyre sent the first such report to the President and to the Congress entitled, Paperwork and Red Tape. In his report, Mr. McIntyre said:

"First actions are underway to establish an information locator system, a step recommended by the CFP. This system will contain an inventory of subject areas of all questions asked of the public by the departments and agencies. With the cooperation of GAO, this should allow any agency to determine quickly which agencies may have gathered data on a specific subject. When fully operational, it will allow for much more effective communication between agencies. It should also result in fewer duplicative paperwork requirements. However, some duplication will always occur because agencies are often bound by confidentiality requirements that preclude transfer of information about individual respondents between agencies."



On November 27, 1978, Deputy OMB Director P. White sent a memorandum to the heads of selected executive departments and establishments convening the Federal Information Locator System (FILS) Task Force. Twenty-six agencies responded by designating representatives and on December 31, 1979, the Task Force submitted its Final Report to OMB Director McIntyre. The Task Force made 14 recommendations, calling for the careful planning, design, development, testing, and debugging of a "bi-level" system (i.e., with modules at both central management agency levels, such as OMB and GAO, as well as operating agency levels) over a 3-5 year elapsed period, costing in excess of \$3 million dollars to develop (for just the central OMB/GAO module alone). Notable among its recommendations was one urging that FILS and its data bases not be opened to non-agency use (e.g., the public) for a period of 1-2 years following the initiation of the fully operational system on a government-wide basis, in order to allow a suitable period for data validity purification.

Meanwhile, on November 30, 1979, President Carter signed Executive Order 12174, Paperwork, directing (in Section 1-106a) the establishment of "a Federal Information Locator System, which will list all the types of information collected by Federal agencies and will be available for use by all agencies. This, or similar systems will not contain any information obtained from the public. The Director shall take any other steps needed to prevent duplication, including the assignment to a particular agency of lead responsibility for the collection of certain types of information." The significance of Executive Branch action regarding FILS is, of course, that the OMB need not await legislation to proceed. Indeed, OMB has not waited and should be credited with taking the lead in moving ahead in this area despite certain controversies regarding other elements of the paperwork legislation.

In August, 1980, OMB awarded the FILS systems design contract to Planning Research Corporation (PRC) for a first phase effort involving three principle deliverable products. Task 1 involves a more precise definition of FILS user needs beyond what the FILS Task Force produced. Task 2 involves describing, analyzing, and documenting existing agency locator-type systems, again, going beyond what the Task Force did. The third task involves identifying and describing alternative computer systems approach. Specifying the method to be applied in the technical aspects of input, data management, output, and telecommunications. Task 4 requires the preparation of a detailed cost analysis of each of the Task 3 alternatives, and Task 5 requires the preparation of a detailed implementation plan and schedule for each alternative, broken into the conventional stages of systems design, programming, systems testing, data base creation, and installation and training. PRC sub-contracted with Saul Herner & Company, an information science firm in Washington, D.C., with cataloging, indexing and abstracting skills, to assist in the development of the data element dictionary recommendations.

(8) Other Pertinent Legislation, Regulations, and Policies

Beyond the notable areas of ADP, records management, the Federal Information Locator System, and the efforts of the Paperwork Commission, several other related laws, regulations and policies have affected the current paperwork and information legislation environment. These areas include telecommunications, privacy, and recent OMB reorganization.

First, Reorganization Plan No. 1, implemented by Executive Order 12046, gave OMB, OSTP, NTIA, the Department of State, and GSA shared authority in the telecommunications policy area. NTIA was given the primary focal responsibility for policy and oversight responsibility after OMB, including Federal Telecommunications Policy, Domestic Telecommunications Policy, International Telecommunications Policy (with State), Federal spectrum Allocation and Assignment, and Standards (shared with NBS). While the last two Congresses (95th and 96th) have made several attempts to amend the primary legislation in the communications area (the Communications Act of 1934), so far such efforts have failed. PL 96-511 gives OMB and GSA increased authority for policy, oversight, standards formulation, and research in the telecommunications area.

Second, the Privacy Act of 1974 and related regulations and policies (e.g., OMB Circular A-108, TMI, FPMR 57 B-57, FPMR 101-35.17, Spec. Pub. (NBS) 500-10, and others) are related to the newly enacted legislation. In recognition of one of the Privacy Act's central tenets, that information about individuals shall not be used or disclosed to unauthorized persons without the expressed permission of the subject, the Federal Information Locator System will not have any information in its data bases about individuals. In short, if an information seeker identifies a certain information system or data base or file of records containing information on an individual which he or she seeks, via the FILS, the seeker would have to approach the agency possessing the information and obtain its release in accordance with existing rules and regulations pursuant to the Privacy Act, the Freedom of Information Act, and any other pertinent laws or regulations that might apply. The same may be said about financial or business information on businesses which might be held by an agency such as IRS, FTC, SEC, or the Census Bureau.

The only other facet of the Privacy Act touched upon by the Law is the notion of sharing non-personally identifiable information in the interest of reducing unnecessary overlap and duplication where one agency may be able to use information already collected by another. But once again, essentially the same rules would apply (as noted above) to personally-identifiable information if the information was obtained initially under pledges of confidentiality. In this regard, it may be interesting to note that the Paperwork Commission found

that some 170 laws or more had some kind of statutory constraint inhibiting, frustrating, or forbidding the sharing of information. The enacted legislation uses the conventional language of foreclosing sharing except where no other laws preclude it.

The third area of interest concerns steps which OMB has already taken in preparation for its new authorities and responsibilities under PL 96-511. These steps fall into two primary areas: organizational and policy/procedural. OMB moved in early 1980 to establish a new office that combined the former Information Systems Division and the Regulatory/Reports Management Division. This office, called Regulatory and Information Policy contained authorities stemming from the Federal Reports Act of 1942, P.L. 89-306 (the Brooks Act), P.L. 93-579 (the Privacy Act), Executive Order 12044 which assigned OMB the responsibility for assuring effective implementation of regulatory reform by Federal agencies, Executive Order 12046, which assigned OMB responsibility for developing and establishing policies for Federal Telecommunications Systems, and Executive Order 12174 which assigned OMB responsibility to review and approve or modify each agency's paperwork budget and called for the establishment of FILS. This office had three internal divisions, Regulatory Policy, Paperwork and Information Policy, and Statistical Policy, following a so-called "desk officer" approach wherein each professional was assigned office-wide (i.e., comprehensive) responsibility for an agency as well as some substantive policy facet.

Next, in the policy/procedural area, on April 21, 1980, OMB issued a memorandum to departments and agencies on the so-called Information Collection Budget (ICB). Under the ICB concept, each department and agency is required to submit to OMB a listing of all of its public use reporting requirements from which an initial ceiling or budget for information collection will be established by OMB for each agency. The original submissions have been received and analyzed. They appear in OMB's report, "Information Collection Budget" which was published in January 1981.

In January of 1981, pursuant to Section 3503 of PL 96-511, OMB established an office of Information and Regulatory Affairs (Office Memorandum No. 81-11, January 29, 1981). The Office currently consists of three internal divisions dealing with Reports Management, Regulatory Policy, and Information Policy. A division of statistical policy is scheduled to be added April 1, 1981. At the writing of this report, OMB is in the process of developing guidelines for use by the Agencies in establishing their senior information official.

(9) H.R. 6410 and S. 1411 - The Paperwork Reduction Act

In late 1979, the House Committee on Government Operations developed H.R. 3570 under the sponsorship of Congressman Frank

Horton. This bill was to address the findings and recommendations of the Commission on Federal Paperwork but largely from a paperwork perspective (information collection and reports clearance). At the same time, the Senate Governmental Affairs Committee was considering a companion paperwork bill, S. 1411, which was very similar in wording and focus to H.R. 3570. In addition, a bill (H.R. 5424) dealing with the Government Printing Office (GPO) and information dissemination was also being considered in the House. Further, the House Government Operations Committee (GOC) had traditionally been focused on information transmission, processing, and use as evidenced by P.L. 89-306 (the Brooks Act) and wished to strengthen the management and leadership role of OMB in this area.

At the initiative of Congressman Jack Brooks, Chairman of the Committee, the GOC began considering the consolidation of these several diverse information management initiatives into one comprehensive piece of legislation which would address the entire life cycle of information from collection, through transmission, processing, storage, use, and dissemination. As a result, H.R. 3570 evolved into H.R. 6410, which integrated the work of the GOC, the Paperwork Commission, the President's ADP Reorganization Project, the Telecommunications Reorganization Plan, the GPO bill, and the Staff Policy Project. Hearings were held on H.R. 6410 by the Subcommittee on Legislation and National Security on February 7, 21, and 26, 1980. On March 4, 1980, H.R. 6410 was passed and ordered reported by the full Committee. On March 24, 1980, the bill, entitled The Paperwork Reduction Act of 1980, passed the House of Representatives by a significant margin, 328-13.

H.R. 6410 was then referred to the Senate Committee on Governmental Affairs on March 26. Hearings were held in April, 1980, and on August 1, 1980, the Subcommittee on Federal Spending Practices and Open Government reported favorably a substitute to S. 1411 to the full Committee (other bills considered included S. 119, S. 259, S. 2624, S. 2608, and S. 391). The full Committee on Governmental Affairs unanimously adopted and ordered reported the language of H.R. 6410 as a substitute to S. 1411 with amendments on August 5, 1980. S. 1411 was then also entitled, "The Paperwork Reduction Act of 1980." The language and focus of H.R. 6410 and S. 1411 by then were considerably different from the original paperwork bills, concentrating on the much larger issue of information resources management.

Beginning in August 1980 and continuing in September and October until the Senate's adjournment, various Federal agencies (including DoD), as well as several Senators, expressed a number of reservations regarding one element or another of the bill. Notably these included:

- The Defense and Intelligence communities, including the Joint Chiefs of Staff with respect to OMB and GSA roles in procurement, management and control of sensitive, national security-related computer and telecommunications equipment
- Several senators concerned with the possibility that the newly created OMB Information Policy Office might somehow down-grade the priority these senators believed should be afforded to regulatory reform efforts and programs (vis-a-vis information and paperwork reforms)
- Various civil liberties group such as the ACLU concerned about adequate assurances being given precluding the inclusion of personally identifiable information in the locator system
- The need for a 'fast track' for emergency report requests such as those concerned with natural disasters, health, safety, and security.

All of these concerns were addressed by the Senate Committee staff and key bill leadership senators (e.g., Senator Lawton Chiles) during negotiations after the bill was reported out of the Committee in preparation for a floor vote. Every hold placed on the bill, ultimately, was withdrawn in the last few days prior to Senate adjournment.

Because of the lack of time and the press of higher priority business such as continuing resolutions to keep the Federal Government running, the Committee simply ran out of time in its attempts to get the bill to the floor for a vote, and the Senate adjourned without action being taken. The bill was taken up again in the so-called "lame duck" session when the Senate reconvened after the election in mid-November. As a consequence of the hearings, the Senate revised various aspects of the bill. Senator Chiles quickly brought it to a vote, and it was passed. The Senate version then stood in conflict with the House version. A 2/3 vote was needed in the House to accept the Senate amendments. The legislation was formally scheduled for a Tuesday vote, but, in fact, was brought up on Monday instead, and passed. In spite of a last-minute attempt by six Cabinet Departments to seek a veto before the final signing into Law, President Carter agreed to proceed and PL 96-511 became official on December 11, 1980.

## 2. KEY ELEMENTS OF PL 96-511

This section presents a brief analysis of the key provisions of the Law, especially as they relate to ADP in DoD. The complete Law is included in the Appendix to this report.

### (1) Section 3501 - Purpose

- . Federal Information policies and practices should be coordinated, integrated, and made uniform
- . Information needed by agencies should be obtained and used with a minimum of burden and cost on those from whom it is collected (notably the public)
- . Agencies should maintain their collected information in a manner to maximize usefulness to all agencies
- . The Act shall be consistent with the Privacy Act of 1974; information on persons or businesses should be safeguarded and not disclosed except pursuant to applicable laws and other safeguards
- . ADP and telecommunications equipment should be used to improve service delivery, program management, increase productivity, reduce waste and fraud, and reduce information processing burden.

(2) Section 3502 - Definitions

The list of terms defined in this section include:

- . Agency (to include DoD, its components, and the Services, but to exclude GOCO facilities and national defense laboratories)
- . Automatic data processing, automatic data processing equipment, and telecommunications (to exclude ADPE used in intelligence, cryptology, direct command and control of forces, embedded weapons systems, or critical to direct fulfillment of military or intelligence missions)
- . Burden (on "persons" to provide information)
- . Collection of information (from the public or other Federal agencies)
- . Data element (a distinct piece of information)
- . Data element dictionary (a system containing standard data element definitions)
- . Data profile (a synopsis of an "information collection request")
- . Director (of OMB)
- . Independent regulatory agency (as listed)

- . Information collection request (a requirement calling for the collection of information)
- . Information referral service (a function of assisting access to FICS)
- . Information systems (means management information systems)
- . Person (individuals or collective groups)
- . Practical utility (the ability of an agency to process and use the information it collects)
- . Recordkeeping requirement (imposed by an agency on persons to maintain records).

As is typical of the legislative process, this list of definitions is neither extensive nor complete in order to accommodate the dynamic nature of this field (IRM). To a large extent, it reflects the history of the legislation and the issues that required clarification during deliberation in both the House and the Senate. Several important terms, such as "information resources management" and "management information systems" are not defined in this section. However, they are discussed in the Committee Reports, (#96-835 in the House; #96-930 in the Senate). These reports, as well as the Committee staff members, themselves, should be consulted if further clarification of terms is required.

(3) Section 3503- Office of Federal Information and Regulatory Affairs

A new office of Federal Information and Regulatory Affairs (OFIRA) is created within OMB to be headed by an Administrator. The incumbent reports to and advises the Director of OMB on regulatory and information policy matters and administers the programs of the new office. In fact, a very similar office already exists as was pointed out earlier in this report. Its authorities are strengthened, however, and its responsibilities lengthened by the Law.

(4) Section 3504 - Authority and Function of the OFIRA Administrator

The Director shall provide overall direction in development and implementation of Federal information policies, principles, standards, guidelines, review and approval of information collection requests (e.g., the information collection budgets); reduction of the paperwork burden placed by Government on the public; coordination of Federal statistical activities; incorporating IRM principles into traditional records and paperwork management; consistency with the Privacy Act, with no disclosure of unauthorized information on persons or businesses

or other entities; increased sharing of collected information between agencies; more effective use of ADP and telecommunications technologies.

This section does not require any new or extraordinary coordination function between the Director and the Administrator of General Services regarding ADP and Telecommunications acquisition. This section makes it clear that agency needs are to be established by the agency and met through the budget process, not by GSA.

(5) Section 3505 - Assignment of Tasks and Deadlines

Within one year of enactment: establish standards and requirements for agency audits of all major information systems; establish the Federal Information Locator System (Executive Order 12174 does not set a deadline for FILS operation; the legislation does); identify areas of duplication in information collections and develop a schedule for elimination; develop a proposal to augment FILS, to include data profiles of major information holdings of agencies; identify initiatives to reduce by 10% the paperwork associated with administering the Federal grant programs.

Within two years of enactment: establish a schedule and a management control system to integrate the various information handling disciplines; identify initiatives for improving productivity through using information technologies; develop a program to enforce information processing and language standards and revitalize standards development programs; complete action on recommendations of the Commission on Federal Paperwork (this provision effectively extends the lifetime of the CFP's recommendations deadline two more years); develop a five year plan to meet Federal ADP and telecommunications needs; and submit legislative proposals to remove inconsistencies in laws and practices involving privacy, confidentiality and disclosure of information.

(6) Section 3506 - Federal Agency Responsibilities

This section requires compliance with OMB-prescribed policies and regulations, and with the law itself; designation within three months of a senior focal official (or officials in DoD) to report directly to the agency head for purposes of implementing agency responsibilities; conduct of an inventory of agency information systems and a periodic review of its information management activities (e.g., planning, budgeting, accounting, etc.); insurance of no overlap in information collections with other agencies; compliance with the requirements of FILS; and the development of procedures to assess paperwork and reporting burdens of its information collection programs on respondents in the private sector.



The significant difference between Defense and other departments under this section is the allowance for DoD and military departments to have more than one senior official reporting to the agency head to carry out the responsibilities of the Law. This would allow the current organizational separation of ADP and telecommunication functions to continue as is, or from another perspective, preclude the "bottlenecking" of reports clearance through only one official avenue. The question of how many more than one is not addressed; however, the Law clearly states: "If more than one official is appointed for the military departments, the respective duties of the officials shall be clearly delineated." The issue of just how many officials there should be in DoD will need to be resolved with OMB and Congress.

(7) Sections 3507 through 3510

These sections all spell out in somewhat further detail how the reports clearance process should operate within agencies, including such requirements as the necessity for public hearings, the designation of central collection agencies (already called for by E.O. 12174), and encouragement of information sharing so long as the disclosure of unauthorized information is not involved.

(8) Section 3511 - The Federal Information Locator System

This section requires the establishment of a Federal Information Locator System, composed of a directory of information resources, a data element dictionary, and an information referral service. The objectives and capabilities discussed in this section are compatible with those already in motion as a result of E.O. 12174, as discussed above.

(9) Section 3512 - Penalty for Failure to Furnish Information

Notwithstanding the provisions of any other law, no persons shall be penalized for not providing information to an agency if the collection requirement is levied after December 31, 1981 and does not have an appropriate OMB control number.

(10) Section 3513 - Director Review of Agency Activities

Once every three years there will be selective inspections of agency information management activities, with the assistance of GSA. Inspection reports go to the agency head, House Committee on Government Operations, Senate Committee on Appropriations, and committees of the Congress having jurisdiction over the inspected agency. The reviewed agencies are to receive inspection reports within 60 days of completion, and to respond to those reports in writing describing measures planned or taken to alleviate the identified problems.

(11) Section 3514 - Responsiveness to Congress

Annual reports from the OFIRA to the Congress will identify proposals for legislative changes; legislative impediments to agency information needs; and a summary of accomplishments which agencies and the Government as a whole have taken to alleviate the paperwork burden.

(12) Section 3518 - Effect on Existing Laws and Regulations

Among other provisions, this section states that nothing in the Law: (1) affects or reduces "the authority of the Secretary of Commerce or the Director of the Office of Management and Budget pursuant to Reorganization Plan No. 1 of 1977 (as amended) and Executive order, relating to telecommunications and information policy, procurement and management of telecommunications and information systems, spectrum use and related matters;" (2) increases or decreases "the authority conferred by Public Law 89-306 on the Administrator of the General Services Administration, the Secretary of Commerce on the Director of the Office of Management and Budget;" or (3) increases or decreases "the authority of the President, the Office of Management and Budget or the Director thereof, under the laws of the United States with respect to the substantive policies and programs of departments, agencies and offices, including the substantive authority of any Federal agency to enforce the civil rights laws."

It also indicates that the chapter does not apply to the collection of information during the conduct of intelligence activities as defined by Executive Order 12036. The impact of these statements is that the previous laws and regulations concerning ADP, ADPE acquisition, and information management still apply under the new law.

(13) Section 3520 - Authorization for appropriation

Funds are authorized not to exceed \$8 million for FY 1981; \$8.5 million for FY 1982 and \$9 million for FY 1983. In effect, this would constitute more than a doubling of existing professional staff resources currently authorized for the previous Office of Regulatory and Information Policy in OMB. The responsibilities, however, would be more than doubled.

3. THE LAW AND IRM

The concept of Information Resources Management is not defined in PL 96-511, but it is implicit throughout the Law. It appears to impact four broad information disciplines:

- Automatic Data Processing and the management of automated information systems throughout their life cycle

- . Information management and the traditional control of information requirements, forms, reports, and data elements
- . Records management and the disposition of official Federal information
- . Telecommunications and the transmission of information electronically, particularly when such transmission involves ADP.

The IRM concept impacts each of these management disciplines by providing a framework which encourages consideration of the interrelationships among these disciplines in the establishment of individual policies. The coordination of these policies is a major objective of the legislation. As Louise Becker of the Congressional Research Service has pointed out in her staff paper released in September, 1980, Information Resources Management (IRM) -- Prospects and Perspectives, the Paperwork Reduction Act does not utilize the term "information resources management" although it does encourage the development of:

"Structural units within the Federal Government which are compatible with the IRM concept. A striking quality of both the bill and the concept is that a focus or centralization of information-related activities management is established. While the Paperwork Reduction Act does not require Federal agencies to establish any specific organizational structures, the responsibilities of Federal agencies and those of the 'senior official' may require realignment of present information resources management structures to assure compliance. The lack of specificity regarding organizational structures in the proposed legislation should provide greater flexibility in developing agency structures. This factor would seem to encourage experimentation with a variety of arrangements which should ultimately reflect specific agency objectives and requirements."

The Congress deliberately did not attempt to spell out in detail some "idealized" IRM organizational structure nor to be too specific in listing the information-related activities or functions to be embraced at either the Government-wide level or within individual agencies. It is much too early to evaluate alternative IRM structures and functional groupings. Indeed, the Commission on Federal Paperwork was strongly urged to recommend further pilot testing and experimentation within agencies before developing a final definitive list of responsibilities and activities which the 'senior official' would coordinate. Mr. Carr of ADTS/GSA, in his testimony on the bill, suggested several senior officials may be needed; others have made the same suggestion.

Moreover, when one reviews progress to date in the agencies in planning for and implementing the IRM concept, it is easy to discern distinctive differences in the approach being taken. For example, if one compares what is happening in the Department of the Interior, in the Headquarters, Department of the Army, in the Federal Communications Commission, in the Department of Energy, in the Civil Aeronautics Board, and elsewhere, very definite disparities in approach can be readily seen. In some cases a clustering of all of the possible information-related activities and functions is being attempted. In others there seems to be a phased attempt, perhaps first looking at the consolidation of the manual activities (e.g., forms, records, reports, etc.) or at only automated information. In others there is still a tendency to separate technical (mission) information from administrative (management) information.

This kind of experimentation and testing is precisely what is needed under the circumstances. Each department and agency has a different kind of mission and a different set of problems. Organizational structures and functional alignments are, after all, means to some end, not an end unto themselves. Therefore, structures and authorities must be carefully drawn and allocated where they will do the most good for "bottom line decision-making." Moreover, the strengths and weaknesses of key leaders and decision-makers within organizations must be taken advantage of, not ignored or buried. Regarding current agencies experiences with implementing the IRM concept, in some cases a very experienced and skilled information generalist has been brought in to manage a full clustering of information programs. In other cases, more technical skills are fitted to specific information programs and the pattern of leadership and management is more one of a collegial body of peers than a strong autocratic style.

Because IRM is in a very real sense a "new" concept, there are very few experienced IRM managers available with all the requisite knowledge and skills. They will have to be groomed and grown. In some cases, a senior administrative officer with wide support and service experience may be able to do the job best. In others, a more technically-oriented incumbent with a relative narrow set of technical experiences and skills would be the stronger alternative.

In summary, we agree again with Ms. Becker in her analysis when she says:

"The information resources management concept seems to be evolving at this time and there appears to be a need to examine closely the effectiveness of the approach as well as the middle- and long-term implications of the concept. There may be a special need to study the implications of concentrating information management responsibilities, and the appropriate type of leadership required by such changes, in organizational structures."

In the next chapter we discuss the current status of ADP in DoD as it relates to the newly established Law.

#### **IV.**

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#### **CURRENT DOD ADP AND INFORMATION MANAGEMENT ENVIRONMENT**

#### IV. CURRENT DOD ADP AND INFORMATION MANAGEMENT ENVIRONMENT

This chapter presents an assessment of the current DoD ADP and information management environment in relation to the provisions of the Paperwork Reduction Act. The chapter begins with a description of a conceptual framework for information resource management and then uses that framework to identify areas within DoD to be assessed. The current status of DoD with regard to policies, organizational structure, and information resource management tools is then described in the next three sections. The fifth section focuses on the relation of the legislation to DoD's Life Cycle Management process for automated information systems. The impact of the legislation in each of these areas is discussed in the respective section. The chapter concludes with a summary of the key impact areas on ADP and information management.

##### 1. CONCEPTUAL FRAMEWORK OF INFORMATION RESOURCE MANAGEMENT

In this section we present a conceptual framework for discussing information resource management within DoD or any large organization. While no specific implications are drawn concerning the DoD environment, this framework is used in subsequent sections to identify areas of impact of the proposed legislation.

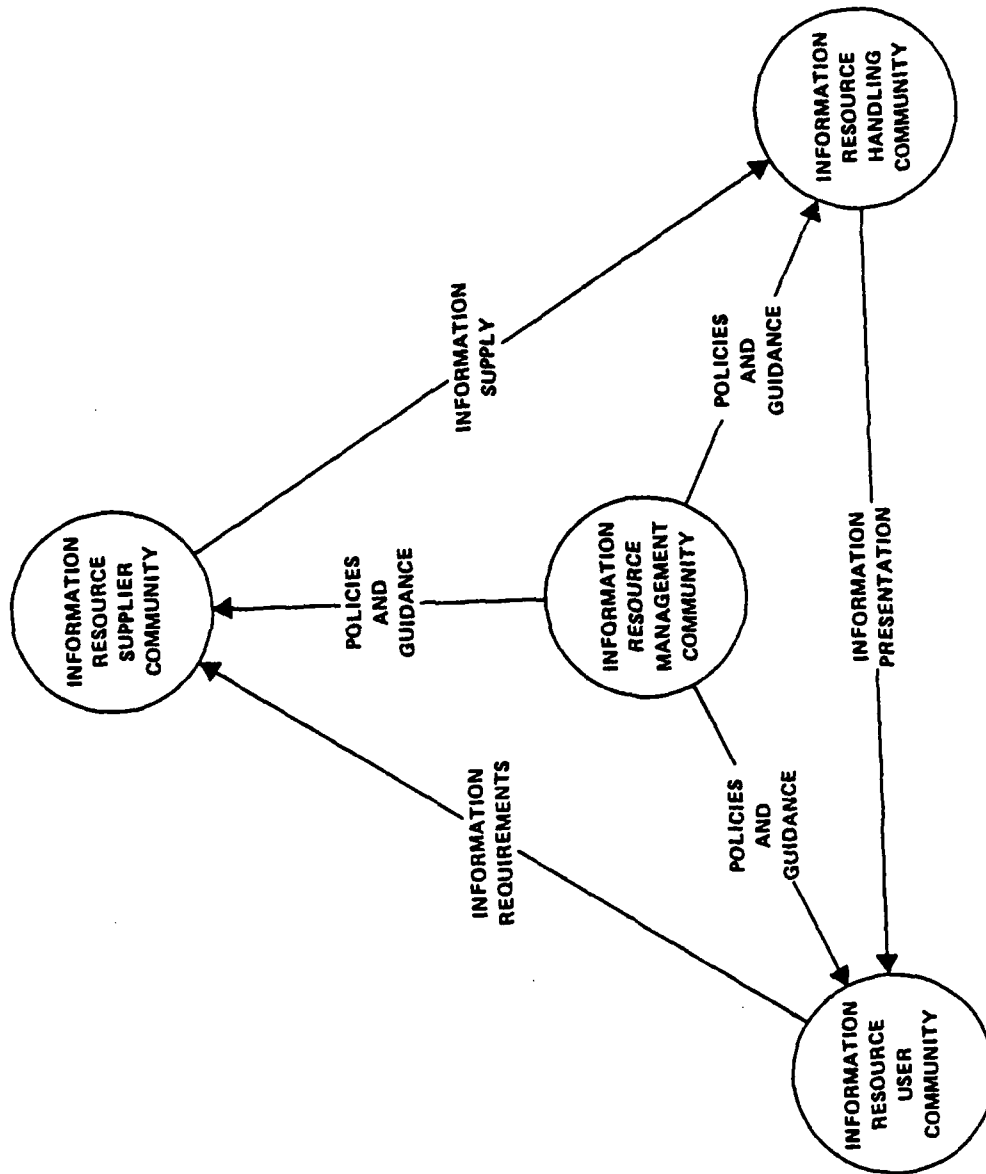
Information is increasingly being recognized as a valuable and costly resource, and thus, the effective management of this resource is an important topic for DoD. The concept of information resource management considers information as a commodity. However, the management of a commodity as a resource must be distinguished from the management of the commodity itself. Managing a commodity as a resource requires a focus on information about the acquisition, maintenance, and disposition of the commodity rather than controlling the actual use of that commodity.

To accomplish this, a coordinated, directed mechanism is needed whereby an organization can effectively manage the information resource. Exhibit IV-1 depicts the essence of the definition of the information resource management environment. In effect, the information resource can be viewed in an environment composed of four general communities, or perspectives:

- . The Information Resource Supplier Community
- . The Information Resource User Community
- . The Information Resource Handling Community

# The Information Resource Communities

EXHIBIT IV-1





. The Information Resource Management Community

Information can be considered to pass through its own life cycle where users specify their information requirements to the suppliers who acquire the information and provide it to the handlers who transmit the information, process it in some predetermined fashion, and store it for future retrieval. The users then specify, either ad hoc or in advance, what information they specifically require at a given time and the handlers, in turn, prepare the information for presentation to the appropriate users.

The information resource managers oversee the execution of the information life cycle and establish policies and guidance for each of the other communities to ensure a cooperative and efficient environment from the enterprise perspective. Thus, the information resource managers identify opportunities to share information resources among multiple user groups, are concerned with the overall cost and impact of data acquisition, develop standards to facilitate information exchange, assist in the development of information plans, and establish rules governing the authority and responsibilities of the various communities regarding information availability, integrity, security, and cost. DoD has in part addressed the above functions as part of its information management policies embodied in DoD Directive 5000.19.

It is essential in this process that the fundamental philosophy that information is indeed a valuable resource and that this resource needs to be managed, must be embraced and understood at all organizational levels. It is key that top management be committed to the philosophy and provide the necessary direction and allocation of resources for an effective approach. There must also be middle management agreement with the principles of IRM and a commitment to abide by the philosophy to obtain mutual benefits. The supervisory and operational level must have an understanding of the concepts involved, be aware of individual responsibilities, and must develop the technological sophistication necessary to implement and maintain a coordinated approach to managing the information resource.

Along with the promulgation and acceptance of an overall philosophy, a cohesive effort to move towards managing information as a resource would consist of the following specific elements:

- . A set of policies and procedures to impart the philosophy and to govern needed activities
- . An organizational structure to develop, implement, monitor and execute the policies and procedures as well as the overall IRM effort itself
- . A set of tools to assist the development, implementation, monitoring, and execution process.

These elements are further developed conceptually in the following paragraphs of this section.

(1) Policies and Procedures

A set of policies and procedures will be needed that can govern the conduct of efforts towards information resource management. DoD policies for information management and control have in recent years been consolidated in DoD Directive 5000.19. This directive along with numerous ADP policies within DoD are discussed in detail in subsequent sections of this chapter. Development of these policies is, in part, an evolutionary process by which an organization more clearly defines the specific approach which is best suited to its needs and capabilities. In general, policies should be considered regarding:

- . Overall purpose, direction and scope of the effort
- . Authority, monitoring activities, and enforcement
- . Organizational placement of the activities for managing the information resource
- . Determination of information proponentcy and sole competent sources for data
- . Data standardization and information resource directory construction
- . Access, privacy, security and freedom of information issues
- . Quality control of data validity, accuracy, consistency, and the retention process
- . Authority over the review of the information systems plans of elements of the organization
- . Forms, reports, and records control.

(2) Organizational Structure

The organizational structure to develop, implement, monitor, and execute the policies, procedures, and the resource management activity itself must be carefully considered when instituting measures toward information resource management. Primarily, the organizational considerations for the initial process of managing information as a resource center on what is feasible to initiate the effort. Accordingly, focus should be placed on determining:

- . What information resource management activities are initially necessary

- . Where those activities are currently being performed (if at all)
- . What level of authority will be required for each activity.

Organizational structures and functions exist within DoD to manage the ADP and information resources. They include organizations for ADP policy and plans, information management and control, and records management. A detailed discussion of these functions as carried out by DoD is provided in Section 3 of this chapter.

### (3) Management Tools

The tools to assist in the management of the information resource are many and varied. Some of the major tools either contemplated or existing within DoD include:

- . A data standardization program for data elements and data items (e.g., DoD Data Elements and Data Coder Standardization Program: DD 5000.11)
- . Data bases pertaining to forms, records, and reports to be managed
- . Data Element Dictionaries and Directories (e.g., IRCAS, DIALS or LOGDRMS)
- . Audit mechanisms for quality control of data and information resource management policy compliance control
- . Cost accounting mechanisms for information.

The degree of sophistication of these tools existing within DoD and the scope of their application is significant in determining the success of any effort for DoD to manage its information resources.

This section has outlined a conceptual framework of policies, structures and tools for managing information as a resource. The following section of this chapter describes in detail the policies and procedures currently enforced within DoD regarding ADP and information resource management at the Department level. The next section discusses the existing organizational structure and functions at the OSD, Component and Military Service levels as they relate to directing and coordinating the overall effort to manage DoD's ADP and information resources. The existing and planned tools for enabling and facilitating some of these efforts are then described in Section 4.

The existing policy and organizational structure for coordinating and directing information resource management along with the existing

techniques and tools available in DoD are taken together to form the basis for a comparative analysis of the current environment in Section 5. Impacts of the legislation on ADP activities are developed in Section 6 from a comparison of the current environment against the concepts and requirements embodied in the proposed legislation. The conceptual framework of information resource management developed above is utilized as a formulation and frame of reference regarding the information resource management concepts that the legislation potentially supports.

## 2. CURRENT RELEVANT POLICIES AND PROCEDURES

The following describes the current DoD policy environment in the area of ADP planning as well as information management, data standards, and records management.

### (1) ADP Planning, Policies, and Procedures

Development and direction for implementation of policies, plans, and standards associated with the administration of the DoD ADP Program is performed by the Office of the Director for Data Automation under the Deputy Assistant Secretary of Defense (Management Systems). The Directorate for Data Automation (DDA) serves as a focal point for developing and updating policies, providing formulation of ADP initiatives and interfacing with the Office of Management and Budget and the General Services Administration on government-wide ADP policy issues. In this regard, policies for the exchange of software with other government agencies through the GSA Federal Software Exchange Center and for release of software to the general public are prescribed by DoD Instruction 7930.2: ADP Software Exchange and Release. This function is performed to reduce or eliminate duplicative software developmental efforts. The Directorate provides advice and analysis regarding the continuation, termination or reduction of major automated information systems DoD-wide. The DDA also plays a key role in ADP resources management by assessing ADP projects and systems in support of the Life Cycle Management (LCM) initiatives and requirements within DoD. A key issuance regarding this major program is DoD Directive 7920.1 Life Cycle Management of Automated Information Systems (AIS).

Policies established for selecting and acquiring ADP resources in DoD are embodied in DoD Directive 4105.55: Selection and Acquisition of ADP Resources. Central to this policy is the requirement that selections of ADP resources be based on well-documented cost effectiveness studies that include considerations of system overlap, duplication, and in part, value added to the end users.

The DDA is also responsible for interfacing with OMB and the Government Accounting Office (GAO) and internal audit staffs

on ADP resource management issues. The Directorate is responsible for monitoring ADP resource sharing and re-utilization. DoD policy in this area is prescribed in Directive 7950.1 (and DoD 7950.1-M): Automated Data Processing Resources Management which assigns responsibilities and authorizes publication of the manual to set forth procedures for reporting and inventorying, sharing and reusing ADP resources.

Importantly, the DDA serves as a focal point to produce a long range plan and ongoing technology forecasts for DoD. A key aspect of the Directorate's function is to strengthen policy and technology interface between general purpose ADP equipment and embedded computer resources. The DoD Long Range Planning Project is an ongoing initiative in this area.

The DDA also provides oversight of information standards and interfaces with the National Bureau of Standards (NBS). DoD Instruction 7935.1 and DoD Standard 7935.1-5: DoD Automated Data Systems Documentation Standards requires that all automated data systems be documented according to the standards established. It also prescribes procedures for determination of the most suitable documentation for any given situation. In addition in the area of ADP concepts analysis and planning, the DDA manages the implementation of emerging government policies on ADP privacy and security. The Directorate also plays an important role in the area of ADP training and career development. The DDA has purview over the Department of Defense Computer Institute established by DoD Directive 4160.49. The program, which is actually run by the Department of the Navy, is designed to improve the skills of DoD Civilian ADP personnel by establishing minimal training requirements for certain designated ADP specialties in the DoD. The DoDCI plays a central role in providing the education and training capability to allow the Department to keep abreast of state-of-the-art technologies and concepts.

## (2) Information Management and Control

The information control function is assigned to the Directorate for Management Information Control and Analysis. The DoD Directive 5000.19: Policies for the Management and Control of Information Requirements establishes uniform policies and criteria for use in the management, control, and registration of internal and interagency information requirements as well as public reporting requirements. This includes acquisition management systems and data requirements placed on contractors. The Directive consolidates policy aspects that were previously dispersed and importantly, establishes policies and procedures regarding the information systems or reporting systems resulting from requirements mentioned above.

The major objectives of this Directive are to:

- . Prevent establishment of duplicative information requirements
- . Assure optimum effectiveness and economy in the flowing of information within, from, and to the Department.

The key underlying principle behind the policies and objectives regarding information management is to control the requirement for information rather than placing control on the output of information. This is consistent both with the basic tenets of the IRM concept as well as with requirements embodied in the proposed legislation.

### (3) Data Standards

Policy and procedures concerning standardization of data elements and terms is promulgated by DoD Directive 5000.11: Data Elements and Data Codes Standardization Program. A major objective of the program is to facilitate common understanding and use of data elements and terminology and thus preclude unnecessary expenditure of resources. The program has been ongoing for sometime, and the DoD Elements have made major progress towards standardization. Procedures and requirements for data element registration are practiced throughout DoD. However, the sheer volume of DoD's total accumulation of data has hampered the development of a more extensively standardized ADP and information systems environment. Moreover, proliferation of smaller stand-alone data processing systems as well as distributed data bases has contributed to the complexity of effecting a standards program. The standards program can form the backbone of the IRM activity by serving to provide up-to-date and effective data dictionaries that are incorporated in data base management and locator systems as part of the IRM concept.

The DoD Data Element Standardization Program seems to be well in place. PL 96-511 should provide the impetus for further clarification and standardization of data. Once OSD identifies how the standards program fits into the larger information management functions of DoD, then specific options, schedules and outputs can be assigned. This should lead to a more streamlined and effective data standardization process.

### (4) Records Management

The OSD Records Management Program as prescribed in Administrative Instruction No. 15 is the responsibility of the Office of the Assistant Secretary of Defense for Administration. The program encompasses a major and visible aspect of the IRM environment within DoD. Several efforts are underway throughout DoD to apply new information technology to the records management function. A good example of this can be found within the Army's

Adjutant General's Office (TAGO) which is in the process of modernizing and redesigning the Army Functional Files System (TAFFS). Other activities are underway in the Navy as well, especially with regard to the personnel system's automated micrographic support. Most records management activities tend to be at lower levels than comparable ADP functions and appear to have less impact on new policy, procedures, and direction. The majority of the established policy for records and forms management was set as a result of GSA/NARS activities concerning disposition and standards programs which were already in place prior to the proposed legislation. Records management is an area in which efficiency and effectiveness can be vastly improved through utilization of advanced technologies such as miniaturization, application of microprocessing, and widely advanced data base and distributed processing technologies.

(5) General Findings and Conclusions

Several general findings were identified concerning the ADP and information management policies and procedures that are currently enforced within DoD.

- . DoD is viewed as a leader in the Federal Government in the promulgation of ADP and information standards
- . Most ADP functions and activities supported by the legislation are currently addressed by DoD Directives and Instructions. Exhibit IV-2 relates the requirements of PL 96-511 to DoD's capacity to carry them out. As indicated in the exhibit, not every requirement has corresponding directives. Further study is needed to: identify any other directives or instructions that might be useful in implementing the Law; and assess the current directives as to their direct utility in fulfilling the responsibilities of the Law.
- . Senior official(s) in DoD must be identified to carry out the responsibilities of PL 96-511. Their functions and interactions with the rest of DoD must be defined. In defining the managerial functions of senior OSD officials, mechanisms must be developed to coordinate existing directives so they will be fully capable of adding and encompassing the larger issue of managing the Department's information resources.
- . DoD has rigorously supported the Federal Government's efforts toward information processing standards, including data standardization. The Department has clearly taken the initiative in developing effective procedures for standardizing ADP systems, documentation, and data elements. DoD has consistently worked closely with NBS, NARS, and other federal agencies who are focusing on ADP standardization issues and activities.

FEDERAL AGENCY RESPONSIBILITIES UNDER  
PL 96-511 AND DOD POINTS  
OF RESPONSE

KEY

- DA - Directorate for Data Automation
- DMICA - Directorate of Management Information Control and Analysis
- 7920.1 - Life Cycle Management of Automated Information Systems
- 4105.55 - Selecting ADP Resources
- 7930.2 - ADP Software Exchange and Release
- 7936.1 - Instruction for documentation
- 7935.1-9 - Standard for documentation
- 4160.49 - Purview over DOD Computer Institute
- 5000.19 - Policies for Management and Control of Information Requirements
- 7950.1 - Procedures for monitoring ADP resource sharing
- 7950.1-M - Manual for monitoring ADP resource sharing

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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Develop uniform information resources management policies. 3504 (b)	DMICA, DA	Mechanism or person to coordinate and unify information policies and resolve conflict
Recommend changes in legislation to OMB Director of Information Policy when appropriate. 3504 (b)	DMICA, DA	(Same as above)
Promote use of Federal Information Locator System. 3504 (b)	DMICA	Assessment of current practices and identification of additional policies where necessary
Submit agency budget proposals on information practices to OMB 3504 (b)	DMICA, DA	Identification of information practices reported to OMB; assessment of budget procedures for each
Develop evaluation methodology to assess agency information management practices, in general, and in compliance with OMB and the Law. 3504 (b)	DA - Prime, DMICA	Investigation of potential of expanding LCM from ADP focus to focus on information resources



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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Determine and oversee research needed with respect to Federal collection, processing, storage, transmission and use. 3504 (b)	DA - Prime, DMICA, others	Consider implications of life cycle of information production
Set goals for reduction of burdens of information collection requests. 3504 (c)	DMICA	Definition of "burden" not only for public use but also for internal use
Develop policy to ensure that all information collection requests are inventoried, display a control number and an expiration date. 3504 (c)	DMICA	
Define and coordinate policies for collecting, interpreting, storing, disseminating statistical information. 3504 (d)	DMICA	
Evaluate statistical program performance and agency compliance with Government-wide policies. 3504 (d)	DMICA	
Coordinate records management policies and programs with related information programs, including information collection, statistics, automatic data processing and telecommunication. 3504 (e)	Records Manager with DA, DMICA	Definition of procedures for coordination and incorporation of responsibilities and areas of accountability into job description
Promote use of ADP and telecommunications to improve the effectiveness of the use and dissemination of data in agency programs; develop methodologies to assess information technologies for use in information resources management. 3504 (g)	DA Adm. Instr. No. 15	Consideration of productivity factors; application of planning and evaluation methodologies to IBM

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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Publish information requirements in Federal register. 3504 (h)	DMICA	
Explain how any collection of information requirement contained in the final rule responds to comments filed by OMB or the public. 3504 (h)	DMICA, 5000.19	Extent to which the directive applies; assessment of need for additional directive(s)
Identify initiatives which may reduce burden of Federal information collections. 3505 (2)	DMICA	Investigate mechanisms to evaluate information technologies for IRM
Identify initiatives to improve productivity in operations by using information processing technology. 3505 (2)	DA Adm. Instr. No. 15	Definition of responsibilities and accountabilities; assessment of impact of technology on people and on career development, as well as need for training; applicability of directive
Provide input on needs for ADP and telecommunications services to GSA/OMB five year plan. 3505 (3)	DA	
Provide effective, efficient economical information management. 3506 (a)	DMICA 7920.1	
Comply with OMB's directives. 3506 (a)		
Designate senior agency officials to carry out responsibilities of the Law. 3506 (b)		Designation and identification of responsibilities and accountabilities of the "senior agency official", including mechanisms for information coordination, conflict resolution and integration.
Systematically inventory major information systems. 3506 (c)	DA, 7950.1 and 7950.1-M	

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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Periodically review information management activities, including planning, budgeting, directing, training, promoting, controlling. 3506 (c)	DMICA 4160.49	Assessment of effectiveness of directives; enhancement where necessary
Ensure that information systems do not overlap or duplicate efforts in other agencies. 3506 (c)	DA 5000.11, 7930.2, 7935.1, 7935.15 4105.55, 7950.1 and 7950.1-M	Definition of criteria for "duplication" of information systems, including data elements, hardware and software components, end-users and services. Identification of areas justifying duplication
Develop procedures for assessing paperwork and reporting burden of proposed legislation affecting agency. 3506 (c)	DMICA	
Assign responsibility and accountability to senior official (b above) for acquisitions management pursuant to a delegation of authority under Section III of the Federal Property and Administrative Services Act of 1949. 3506 (c)	DA	
Ensure that information collection requests comply with Section 3507. 3506 (c)	DMICA	
Establish procedures which insure compliance with requirements of FPLS. 3506 (d)	DMICA	

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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Develop procedures, mechanisms, policies to ensure prior review to: - Eliminate, through FILS, requests that are available from another agency - Reduce burden on respondents - Formulate plans for tabulating info to enhance usefulness. 3507 (a)	DMICA	
Submit proposal to OMB for 60 to 90 day review. 3507 (a)	DMICA	
Prepare notice for Federal Register. 3507 (a)	DMICA	
Obtain OMB approval. 3507 (a,b,c,d)	DMICA	
Develop OSD criteria to determine if info request must be accomplished on an emergency basis. 3507 (g)	DMICA	
Develop hearing material if OMB requests a hearing on an info request. 3508	DMICA	
Determine internal rules for designating a single DOD component to collect certain info for all DOD components. 3509	DMICA	
Develop procedures for interchange of info with other agencies. 3510	DMICA DA	Mechanism and policies for information coordination, integration and conflict resolution

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<u>AGENCY RESPONSIBILITIES</u>	<u>DOD POINTS OF RESPONSE</u>	<u>SIGNIFICANT ISSUES</u>
Refine input system to FTLs. 3511	DMICA	
Prepare for OMB (and GSA) triannual review of info management activities; review OMB and GSA reports; prepare written response to Congress. 3513 (b,c)	DMICA, DA, others	Mechanism and policies for information coordination, integration and conflict resolution

- . Existing DoD policies, directives, and instructions are generally in accordance with the functions encompassed by the proposed legislation. This is in large part due to the fact that the legislation is not intended to create new functions but rather to provide a focus for more effective coordination and implementation of existing initiatives. DoD policies reflect the fact that the Department has made a concerted effort to comply with or exceed the Government's goals of more effectively managing information and ADP systems.

The Law clearly embraces the principle that information should be managed as a valuable resource. To effect information resource management, policies must be developed that address the broad scope of information needs, use, supply and handling. Separate DoD policies exist for nearly all of the elements of the life cycle of information. However, there is a need to bridge these separate policies, make them more cohesive, and thus address the larger issue of managing all aspects of the Department's information resources.

### 3. ORGANIZATIONAL STRUCTURE AND FUNCTIONS

The purpose of this section is to describe the organizational structures within DoD pertinent to the information and ADP management activities which are impacted by the proposed law. The organizational structures are addressed to provide an understanding of how the various ADP and information management authorities and functions are interrelated at the OSD, DoD Component, and Military Service levels.

#### (1) Office of the Secretary of Defense (OSD)

The focal point and authority for many of the activities supported by the bill are vested in three Directorates that report to the Office of the Assistant Secretary of Defense (Comptroller). Each is described in detail below.

- . Data Automation

The Directorate for Data Automation (DDA) is responsible for developing and overseeing the implementation of policies, plans, and standards associated with the administration of the DoD ADP Program. Three key functions performed by this directorate are:

- ADP Policy Development
- ADP Resources Management
- ADP Concepts Analysis

The DDA serves as a focal point for development of new policies and ADP initiatives as well as maintaining interface with OMB and GSA on Government-wide ADP policy issues. A key aspect of the Directorate's activities centers on the evaluation of ADP management capabilities. In this regard, DDA serves as a focal point for performing selective assessments of major ADP projects and systems in support of their total life cycle management (LCM). The implementation of emerging Government policies on ADP privacy and security and general oversight of information processing standards as well as interface with NBS is performed as part of the ADP concepts analysis activities. The DDA also serves as a focal point for ADP long-range planning and technology forecasting for DoD. Another function is to strengthen the policy and technology interface between general purpose ADP equipment (ADPE) and embedded computer resources. The Directorate works with USDR&E and ASD (C3I) to improve computer resources embedded in weapons systems. The DDA also serves as liaison for DoD with other Government agencies, Congress and private industry on broad national and federal ADP policy issues. Finally, the Directorate provides advice regarding the continuation, termination, or redirection of major automated information systems throughout DoD.

#### Management Information Control

The Directorate for Management Information Control and Analysis is the OSD authority responsible for the management of information and for insuring the collection of essential, cost-effective, accurate, and timely information to meet the needs of management. The Directorate is responsible for developing and enforcing DoD-wide policies, principles, and criteria for the management and control of information requirements. These information requirements include internal DoD information, interagency information, public use reports acquisition systems, contractor information, and DoD forms. The Directorate has approval authority for OSD prescribed information requirements. The term information requirements includes automated data files, data bases, management information systems, as well as manually collected or maintained information or data.

Key functions performed by the Directorate include:

- Prevention of unnecessary or marginal information requirements
- Elimination of existing duplication
- Standardization of data elements and data codes

- Registration of approved information requirements
- Dissemination to management knowledge of what information is available

The Directorate is responsible for administering the Information Requirements Control Automated System (IRCAS) in conjunction with the Defense Integrated Automated Locator System (DIALS) which are discussed in the following section. These are tools which the Directorate is using to both standardize data and enable the identification of what information (and major information systems) exist DoD-wide.

#### Records Management

The Records Management Division under the Correspondence and Directive Directorate is responsible for administering the Records Management Program for OSD components. The program objective is to establish and maintain effective control over the creation, organization, maintenance, use, and the disposition of all OSD components records. In accordance with Administrative Instruction No. 15 Records Management Administrative Procedures and Records Disposition Schedules, the Division provides coordination with other OSD Directorates concerning records management matters pertaining to ADP and machine readable records. The Records Management Division cooperates with GSA in improving the management of records, ensuring maintenance and security of records of continuing value, and facilitating the disposition of temporary records.

The Records Management Branch, Washington Headquarters Services (WHS) is designated as the office of record and the point of contact for records management activities. WHS provides administrative support to the head of each OSD component in carrying out their assigned responsibilities as they relate to activities of the DoD records management program.

The telecommunications functions comes under the authority of the Assistant Secretary of Defense for Command, Control, Communications, and Intelligence (C3I). ASD (C3I) in executing its responsibilities in the areas of embedded systems and telecommunications coordinates its activities with the data automation and the management information and records management functions which report to the Assistant Secretary of Defense, Comptroller.

#### (2) DoD Components

The function for ADP and information systems planning, policy, and management as well as records management and



telecommunications are carried out in some form by each of the DoD components. Typically many of these functions report to the component's Comptroller. However, there is no one organizational structure or approach that is representative of the all of the DoD components efforts in these areas.

For example, at the Defense Communication Agency (DCA), the senior ADP official is the Comptroller. The Comptroller is currently responsible for review and approval of information requirements and ADP systems and equipment. However, neither the library nor DCA manual records systems come under the Comptroller's purview. At the Defense Logistics Agency (DLA), the management information control function reports to the Comptroller. However the ADP plans and programs function along with other ADP support elements report to different authorities. For example, the Logistics Data Element Standardization and Management Office reports to the Assistant Director for Plans, Programs and Systems as does the DLA ADPE Replacement Program Office. Within the Defense Mapping Agency (DMA), ADP is under the Comptroller while most other information management functions such as records management and word processing come under Administration.

In addition to the existence of varying organizational approaches there did not appear to be a consistent level of and means for coordination between functions.

### (3) Military Services

Each of the services has a different overall organizational structure and approach for carrying out activities supported by the proposed legislation. Not surprisingly, each approach is in accordance with the general organizational philosophies of each service as they relate to the differing missions of each service.

#### • Air Force

Within Headquarters, Department of the Air Force (HQAF), the senior ADP official is the Comptroller. In the field however, ADP comes under the Communication Command. The Air Force appears to have a centralized policy on data processing resources and there is a significant effort of the Air Force towards information standardization and resource sharing. Both of the payroll system and the system for facility management are standard Air Force-wide. ADP and telecommunications functions are approached separately at the Secretary of the Air Force level with these functions more centrally merged at lower echelons within the Air Force.

#### • Navy

The Department of the Navy senior ADP official is the Assistant Secretary for Financial Management, AS (FM). Telecommunications comes under the authority of the Assistant Secretary for Research, Engineering and Systems although significant coordination occurs with AS (FM) in matters of teleprocessing as they relate to ADP systems. At the Navy staff level, however, the Director, Command and Control (OP 094) has authority over both business computers and telecommunications. Within OP 094 there is an office of the Director of Command Control Support Systems and Information Systems. While this office does not have telecommunications functions, nevertheless the Naval Telecommunications Command, which is at the field level, reports to OP 094. Thus, the Navy has significant central focus and authority for both telecommunications, data processing and information systems. The records management functions at the Navy Staff level are the overall responsibility of the Assistant Vice Chief of Naval Operations, Director of Naval Administration.

The approach to managing information systems and resources at the field level (to include shipboard, shipyard, and production operations), does not greatly differ organizationally from that of the Naval staff. However, a decentralized approach exists nevertheless. The extent of systems and data standardization in place is mixed. While standardization of systems exists, for example, between shipyards management information systems, payroll systems for various operational elements are not standardized. This is also true for various automated inventory and maintenance information systems.

The Navy does provide a high level focus to ADP and information systems, however, the separate Commands retain significant authority in areas impacted by the proposed legislation.

#### Army

In the Department of the Army at the Secretary's level ADP and information systems and in large part records management functions come under the purview of the Assistant Secretary of the Army for Installation, Logistics, and Financial Management, ASA (IL&FM). Teleprocessing aspects of telecommunications are also functions of ASA (IL&FM) to the extent that they do not relate to command and control functions. Telecommunications is thus somewhat split with the Assistant Secretary for Research Development and Acquisition having clear purview over Command Control Communications and Intelligence (C3I).

At headquarters, Department of the Army (HQDA) a major change has recently been initiated by the creation of an Office for Information Resource Management. The office reports to the Director of Management under the Director of the Army Staff and is responsible for developing IRM plans and policies as well as defining the IRM process for HQDA. The IRM office coordinates IRM aspects of the responsibilities of the Assistant Chief of Staff for Automation and Communication (ACSAC) of which telecommunications is part. The IRM office also coordinates the records, forms, and reports management activities of the Adjutant General (TAG).

At the field level, the Army has pursued a rigorous and broad program of system standardization which includes standardized logistics and payroll systems Army-wide. These systems are maintained by the Computer Systems Command which reports to the ACSAC.

The recent decision of HQDA to establish an Office of Information Resource Management warrants further tracking, particularly with regard to their approach for further coordination and control of information resources while at the same time not changing overall authorities and responsibilities.

#### (4) General Findings and Conclusions

Several findings and conclusions regarding DoD's organizational structure and functions related to the pending legislation are identified below:

- . No common structure for ADP and information management was found DoD-wide.
- . The Comptroller often has purview over several functions and activities related to the legislation, but this is not necessarily common to all organizations
- . The records management and ADP communities generally are not heavily interrelated
- . During several interviews it was expressed that the organization within OSD for ADP, information management and records management are perceived as separate and largely uncoordinated activities.

It will be a long and difficult task to unify the numerous elements in DoD which play a role in managing the Department's information. It is too premature to discuss a common structure across agencies. Rather, it is time to identify common objectives and mechanisms for cooperation. OSD must provide leadership in this complex activity. It can do this in many ways, one of the

most significant being to develop an integrated information management structure of its own.

#### 4. EXISTING AND PLANNED IRM TOOLS

The management of information, like the management of other resources, requires a set of tools to assist in the management process. This section describes some of the tools such as automated data dictionaries, directories, data bases and information locator systems that currently exist or are planned within DoD. These tools are valuable towards gaining knowledge of the composition, description, acquisition, dissemination, and flow of data/information that is necessary for effective management of the information resources of an entire enterprise. The potential benefits to be gained from utilization of IRM tools include increased sharing of information, improved access to and awareness of information, reduction of unnecessary duplication, enhanced ability to manage change, and the improvement of the quality and usefulness of the organization's overall information resources.

These issues were addressed in a report of the DoD Blue Ribbon Defense Panel released July 1, 1970 which indicated that excessive duplication of reporting requirements generated so much information detail that important facts are often obscured. The generation of reports within DoD had proliferated to a point where the Panel concluded that merely obtaining a total inventory would be a major undertaking.

In response to this report, DoD promulgated policies currently embodied in DD 5000.19 that place emphasis on management and control of the requirement for information rather than on information itself. The concepts and techniques for controlling information began at the title/subject level. However, OSD realized that in order to enforce policies regarding the management of information, controls had to be established at the data element or data content level. From this concept, the Information Requirements Control Automated System (IRCAS) evolved, and an initial capability to manage and control information at the data element level became operational in 1977. Importantly, however, IRCAS alone does not entirely provide for effective control and standardization of data elements. While IRCAS was an excellent tool for capturing data elements which allowed for their registration in a system for reports clearance and management purposes, IRCAS was nevertheless not equipped to effectively examine the data base to identify and eliminate inappropriate overlaps and duplication of data elements.

Recognizing this deficiency, OSD revised its information management program, retitling it "Integrated Data Element and Information Requirements Management Program." A key aspect of this program is to incorporate a data element disciplinary control mechanism. This mechanism is the data element dictionary. With the eventual addition of a data element dictionary to IRCAS, this new

configuration, now termed the Defense Information Automated Locator System (DIALS), will involve four major processes:

- . Processing information requirements using the original IRCAS
- . Log processing
- . Suspense data elements processing
- . Data element dictionary processing.

The data element dictionary will be used to screen new data element definitions against existing ones to determine if an appropriate definition already exists, thereby potentially reducing duplication. This is not an effort to arbitrarily impose standard definitions for the same commonly used data element in multiple source systems. Rather it is intended to work through a process of attrition whereby unnecessary differences in data element definitions can be identified and eliminated accordingly.

DoD has been making concurrent strides regarding these concepts and tools in specific functional areas as well. The DoD Logistics Systems Plan (1972) addressed the need for preventing the proliferation of non-standard, incompatible, noncomparable, and independently developed systems. OSD has thus recognized that a highly interdependent logistics environment could be seriously hampered from effectively accomplishing its mission as a consequence of poor management and control of information. It is now recognized that data and information, like materiel, are susceptible to the full range of logistics life cycle functions including requirements determination, acquisition, transmission, processing, storage, dissemination, and utilization. The vehicle developed to provide for the meaningful standardization and management of data employed within the DoD logistics community is called the DoD Logistics Data Resource Management System (LOGDRMS).

Specifically, LOGDRMS is designed to provide:

- . Uniform identification, categorization and classification of data
- . An organized means for grouping data representations
- . Maximized visibility of existing data
- . An analytical tool to assess current systems against proposed changes or new systems
- . Means for management of logistics data as a resource.

The contents of LOGDRMS includes a data base for over 35 organizations which include:

- . Joint Chiefs of Staff
- . Army Corps of Engineers
- . Naval Facilities Command
- . Tri-Service Medical Information System (TRIMIS)
- . Assistant Secretary of Defense, Health Affairs
- . Defense Fuel Supply Center
- . DLA Administrative Support Center
- . Naval Supply Systems Command
- . Army Logistics Management Agency.

Each of the user organizations can query LOGDRMS and receive data in their own prescribed formats. Also, agencies can query the system (as authorized) for metadata concerning information attributes of other agencies. LOGDRMS can readily provide internal as well as external interface with other systems.

Other systems DoD-wide are being used to manage information. The Navy's Record Association System (RAS) is a batch oriented system that maintains records on data entities. It can point and direct an inquiry but does not have the full mapping capabilities of a true DBMS. Users of RAS include the World Wide Military Command and Control System as well as selected other Army activities. The Army Reports Control System (ARCS) provides the capability to screen and evaluate new reports. The Army has also made extensive use of RAS III which is an interactive system in addition to utilization of its own ARCS. Recently, there has been discussion concerning the Army's total entry into the LOGDRMS base.

The military services have vigorously pursued information management tools and locator systems in keeping with the spirit of and the requirement in the proposed Paperwork Reduction Act for establishment of a Federal Information Locator System (FILS). IRCAS had at one time been tested by the FILS Task Force and found to be a reasonable foundation for the FILS, however, FILS is currently being independently developed.

Several findings and conclusions regarding the development of IRM tools in DoD are:

- . Several DoD agencies have vigorously pursued development of information management tools and locator systems
- . DoD has endeavored to increase the sharing of information both through data standardization efforts and through use of data base management systems

- . Management and control of information requirements are being stressed as opposed to controlling the information itself
- . Tools are being applied to manage information at the data element level
- . The reports clearance and registration process is being facilitated through capturing of data elements in IRCAS
- . DIALS will represent a significant improvement to IRCAS through incorporation of the data dictionary component.

#### 5. IMPACT OF THE LAW ON THE ADP LIFE CYCLE

A center piece for ADP management policies and procedures is the life cycle management (LCM) of automated information systems. The overall life cycle of an automated information system (AIS) as prescribed in DD 7920.1 October 1978, is composed of the broad phases: Mission Analysis/Project Initiation; Concept Development; Definition/Design; System Levelupment; and Development/Operation. The Law not only supports LCM activities of ADP in DoD, but goes beyond current practices to encompass the life cycle of information production in general. The life cycle of information production includes all activities from information collection to end-use. The production life cycle deals with the value-added processes that transform an information source into products and services. At the midpoint of this life cycle stands an information resource - a source of information (a collection) that has been institutionalized for continuous reuse. The major phases of information production include:

- . Recording/reporting/collecting information into a source;
- . Institutionalizing the source for re-use by establishing intellectual, physical, legal, organizational and economic access mechanisms;
- . Maintaining the resource;
- . Enhancing the resource via information products and services;
- . Dissemination; and
- . Utilization.

An automated information system often functions as a resource. Indeed, it must if it is to be used effectively. The LCM phases in DD 7920.1 do not address the phases of information production. Because of the Law's emphasis on effective utilization of information, paperwork, and improved service delivery, OSD may want to expand the LCM approach beyond its current useful application to ADP management. In addition to considering enhancements to the current LCM practices,

OSD may also wish to explore the development of several complementary, interrelated life cycles which address the multiple roles which AIS serve within DoD (as resources and as service centers).

Because of the fundamental role of LCM activities in ADP in DoD, areas of impact of the legislation on the LCM process are discussed in detail. The relationships of particular phases of this process to the concepts supportive of the proposed legislation are developed in the following paragraphs.

The purpose of the first phase, Mission Analysis/Project Initiation is to identify a significant part of a mission need and recommend alternative concepts to satisfy that need. A key DoD LCM policy in this regard is that, when feasible, mission needs shall be satisfied through use of existing DoD Component equipment and resources. This is compatible with and supportive of the Law which requires each agency to ensure that its information systems do not overlap each other or duplicate the systems of other agencies. Furthermore, the Law supports a mechanism that can facilitate the identification of existing resources within DoD and other Government agencies. Specifically, each agency is required to "systematically inventory its major information systems and periodically review ... activities involving the collection, use and dissemination of information." The results of these agency-wide reviews will be incorporated into a Federal Information Locator System (FILS). Thus, it will be possible to readily identify major DoD automated information systems and their contents. This will facilitate the LCM requirement to identify existing resources to satisfy mission needs and assist in the development as well as validation of alternative concepts to meet those needs.

Moreover, the user community will be able to more effectively define what information does or does not exist. Because the new law supports greater sharing of information by Federal agencies, the capability to reference an information locator would facilitate adherence to this requirement. Such sharing may require further standardization, integration or interface with other automated information systems. DoD policy for life cycle management already directs that such sharing requirements be accommodated during the project initiation phase.

The Law also encourages coordination of a broad spectrum of information technologies and activities. This strongly supports existing LCM policy which recognizes the interface of ADP, telecommunications and other supporting elements as an integral part of the AIS from the outset of planning and analysis.

The third LCM phase, Definition/Design, again stresses that a new AIS may be developed only after it has been determined that an existing AIS cannot be used or modified to satisfy validated functional requirements. The overall thrust of the Law and the information locator concept strengthens and supports this recurring LCM policy.



The Law also supports LCM from the standpoint of modularity, a technique which is fundamental to constructing an AIS in an LCM framework. It is through modularity -- breaking the system into processes, equipment and units of data/information that a multiple-utility AIS can be designed and developed. Generally speaking, the greater the uses of an information system, the more people served, and the greater the cost economies -- all of which are objectives of the Law.

It is DoD LCM policy that AIS design shall include provisions that will facilitate appropriate functional and technical audit of the AIS. This is entirely compatible with the Law which requires that agency audits be conducted for all major AIS except those used for criminal investigations or intelligence activities. The audit activity under PL 96-511 will assist DoD in identifying areas for improving information systems and will help ensure that the usefulness of information collected by the Department is maximized in accordance with provisions of the enacted legislation.

Through consolidation of OMB's responsibilities under the Brooks Act with the other information management functions covered by the Law, the Federal Government's capability for applying advanced information technology to the problems of controlling paperwork burdens may be improved. In this regard emphasis may be placed during the system development phase of LCM on the use and integration of converging technologies such as computerized micrographics and word processing technology. Also, exploitation of data base management systems as well as data dictionaries and data directory software will continue. The standardization of these and other developmental and operational tools which support information management may become a significant issue as their use is further promulgated.

DoD policy requires that all components of an AIS including functional, ADP and Telecommunications requirements shall be managed as configured items. Configuration management may be impacted by the legislation through expansion of the scope of items to be configured and by reordering of priorities and the sequence of their execution. The validation of the requirements for particular information such as metadata and data standardization are examples of items that may receive earlier or further visibility and attention. Configuration management techniques will become particularly meaningful in developmental projects whose objectives include interfacing and integration of multiple technologies and their associated hardware and software.

It is during the development phase of AIS life cycle management that the acquisition of both software and hardware is most properly conducted. Throughout the numerous interviews conducted during this impact study, strong concern over the effect of the legislation on the acquisition process was expressed many times. The Report of the Committee on Governmental Affairs that accompanied S. 1411 specifically recognizes and addresses the concern that the legislation may expand

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THE IMPACT OF THE PAPERWORK REDUCTION ACT OF 1980 ON ADP IN DOD--ETC(U)

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the scope of the Brooks Act (Public Law 89-306) which confers certain authority on the General Services Administration to control Government purchases of automatic data processing equipment. The Law addresses this issue. It gives the Office of Management and Budget policy and fiscal responsibility over the function. Specifically, it states that "Nothing in this Chapter shall be interpreted as increasing or decreasing the authority conferred by Public Law 89-306 on the Administrator of the General Services Administration, the Secretary of Commerce or the Director of the Office of Management and Budget."

While the tendency has been to focus concern on the acquisition process, clearly ADPE acquisition represents only one dimension of the broad issues that have prompted the evolutionary movement towards managing the overall information resources of an enterprise. Accordingly, it is more appropriate to shift the focus of attention to the broader scope of the life cycle management not only of AIS and ADPE but of information as well. Consider that an AIS is composed of three fundamental sets or elements: information, functions, and hardware. LCM for an AIS focuses on the processes that must be identified, defined and developed in order for the AIS to perform the functions identified as necessary to satisfy the requirements of the AIS. As mentioned earlier, if these functions are already performed by an existing AIS, consideration must be given to the utilization of that system. Similarly, strong consideration must be given to utilization of existing hardware. However, the information content that the AIS will process is typically not given consideration commensurate with its importance. If information is to be regarded as a critical resource, it then follows that the information resource deserves the same kind of management disciplines that are utilized in the management of other resources, including ADP. Data and information can be made subject to the same type life cycle process that has been discussed in this section regarding ADP. Life cycle management of information may be considered to include:

- . Requirements determination
- . Acquisition
- . Transmission
- . Processing
- . Storage
- . Dissemination
- . Utilization.

Information requirements determination directly affects both the design and management of information systems, but is a process that is all too often abridged or overlooked. Determining information requirements starts with the identification and definition of a

problem. It must be determined what information is needed to satisfy identified objectives including the information to manage or administer programmatic solutions to problems. An analysis follows which identifies how the data can be obtained. The information needed may already be available. It then must be determined if the existing information meets all the requirements. If not, output modifications or additional data must be identified and defined.

The second stage of the information life cycle, information acquisition is the process by which information is acquired from one or more sources and transmitted to a central processing point. In planning for information collection one must consider the assessment of needs, information value, its users, benefits, and total life cycle costs.

The third stage of the information life cycle concerns the transmission of information from the point of collection to where it will be processed and used. Relevant issues concern the medium of transmission the format of the information during transmission, security and reliability.

This is followed by the fourth stage of the information life cycle, information processing. During processing, the data collected is massaged and integrated producing some form of output that can become part of the knowledge structure of the enterprise. The next stage, storage can occur in one or more locations and on one or more medium. Costs associated with storage can be particularly significant depending on the timeframe and media prescribed for storage. Once the information has been processed and is available it must be disseminated for use. An automated information system can accomplish this via hardcopy reports or output to terminals for display. It might also mean simply mailing or distributing a manually prepared document. The last stage of the information life cycle addresses the ultimate disposal of the information. This is a critical determination in which an assessment must be made of the residual value of the information to the overall enterprise and not just one of its components.

Consideration of the information's life cycle is a process intrinsic to the life cycle management of any automated information system. It is the current approach to define and track information's entry to and exit from the AIS. Each AIS thus has a local information cycle that is clearly a part of the normal operations of that AIS. Emphasis is placed on the information life cycle support of the AIS life cycle. While interface and interutilization of systems is a strong consideration in the AIS life cycle, the overall approach is one of system by system development. By contrast, when considering the information life cycle of the overall enterprise, information flow from one system to another is stressed. The information life cycle can be applied not only locally to one AIS but to several or even all systems within an organization. This type of global information life cycle thus supports a system of systems concept whereas previous focus on functionality has resulted in a system by system approach.

Clearly, the LCM of ADP and LCM of information cannot nor should not be mutually exclusive processes. In fact, the concept of IRM embraces a horizontal rather than vertical approach to managing information. The combining of diverse information management functions can have a synergistic effect resulting in more efficient, effective and useful information systems.

As described above, the integration of the ADP and information life cycle management processes would not necessarily result in a direct one to one relationship for each phase of the two LCM's. Rather, there would be an interweaving from one LCM process to the other. It is notable that data and information are not normally expended when used. In fact, the effective use of information dictates that it be reutilized to its broadest extent. ADPE, on the other hand, while it can be re-utilized and does have significant residual value in its life cycle, information classes and types inherently have a greater potential to be utilized by several users for many differing purposes. Thus, the information resource can have a more pervasive effect on the overall conduct of business and should not be subject to subordination by other management cycles.

#### 6. SUMMARY OF IMPACTS OF THE LAW ON DOD ADP ACTIVITIES

A comprehensive listing of Federal agency responsibilities under PL 96-511 and DoD points of response is presented in Exhibit IV-2. Whether or to what extent the responsibilities under the Law will affect individual job descriptions and performances is open to question. This is a subtle but key issue which warrants attention because it relates to daily work practices and to each of the many agency responsibilities required by the Law.

The following provides a summary of the areas of impacts of the legislation on: ADP and information management policies and procedures, organizational structures and functions, and ADP and information management tools.

##### (1) Areas of Impact on ADP Information Policy and Procedures

A majority of the functions and activities supported by the legislation are currently addressed by DoD Directives and Instructions. Moreover, DoD ADP and information management policies are aligned with the philosophy and intentions supported by the legislation for better management of the Government's information resources. However, some Directives may require modification to meet explicit provisions of the legislation in areas that include:

- . Periodic inventorying of major automated information systems in accordance with standards developed by OMB
- . Procedures for reporting information management reviews to OMB

- . Fine tuning of the standardization process for ADP and data elements
- . Development of input into the Federal five-year ADP Plan
- . Providing further cooperation in making information available within DoD and to other Government agencies
- . Placing emphasis on applying information technology to DoD's administrative workload.

(2) Areas of Impact on Organizational Structures and Functions

While no common structure for ADP and information management was found DoD-wide, organizations are currently in place that address the policy-making and operational aspects of ADP and information management. To respond to the law closer coordination among these offices is needed regarding:

- . Development of policies that correlate and support the philosophy of information resource management principles embodied in the legislation
- . Integration and sharing of tools and techniques to support the ADP and information management process
- . Coordinating efforts to exploit the use of information technology.

(3) Areas of Impact on ADP and Information Management Tools

DoD has taken a leadership role in the development of tools to support ADP and information management. This includes data dictionary development efforts associated with DIALS and other information locator systems such as LOGDRMS which is also used by several non-DoD government agencies. To comply with specific requirements embodied in the legislation, close coordination will be necessary to:

- . Develop effective means for interfacing with the Federal Information Locator System applied DoD-wide
- . Continue efforts towards standardization at the data element level and to ensure that data element dictionaries are emphasized as part of ADP system development along with information management
- . Ensure that the reports clearance and registration process continues to be facilitated through use of information locator systems

- . Increase the sharing of information both through data standardization efforts and through use of data base management systems.

This chapter has presented an assessment of the ADP and information management environment as compared to the provisions of PL 96-511. The findings, conclusions and areas of impacts described in this chapter form the basis for the study conclusions and recommendations presented in the following chapter.

**V.**

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**STUDY CONCLUSIONS AND  
RECOMMENDATIONS**



## V. STUDY CONCLUSIONS AND RECOMMENDATIONS

### 1. STUDY SYNOPSIS

In this study we have attempted to assess the potential impact of the Paperwork Reduction Act of 1980 (PL 96-511) on automatic data processing activities in the U.S. Department of Defense. In this regard we have addressed DoD ADP planning regarding the legislation, the potential role of OSD in responding to the requirements of the Law, and the steps necessary to implement its provisions. The information and analysis of this study is intended to provide input into the DoD planning process in preparing for implementation, to suggest areas for management attention, and to identify opportunities for further related impact studies under the current DoD Long Range ADP Planning Project.

Our study was conducted with limited resources over a brief period of time and was limited in scope to the ADP environment. The scope of the Law, of course, is considerably broader than automatic data processing, although ADP and related information technologies play an important and integral role in the management of Federal information resources as addressed by the Law.

In this chapter of the report we draw some general conclusions regarding ADP in DoD and the potential impact of the Paperwork Reduction Act of 1980 and we recommend some alternative approaches for preparing to implement its requirements.

### 2. STUDY CONCLUSIONS

The conclusions presented in this section of the report are a consolidation of the findings and observations made in the course of the study. These general conclusions, which are discussed individually below, are

- . The Federal Government Is Taking Steps to Confront and Resolve Its Information Resources Management Problems, as Seen in the Passage of PL 96-511
- . Information Resources Management Is a New Concept for Some DoD Organizations Which Is Not Uniformly Defined nor Well-Understood
- . The New Law Crosses Several Disciplines and Current Organizational Boundaries within DoD with No Clear-cut Single Assigned Responsible Agent
- . The Major Areas of Concern Within DoD for Implementing the Law Focus on Questions of Authority, Scope, and Bureaucratic Inefficiencies.

Each of these general conclusions encompasses several specific conclusions which are described below. These conclusions serve as the foundation for the recommendations which follow in the next section.

(1) The Federal Government Is Taking Steps to Confront and Resolve Its Information Resources Management Problems, as Seen in the Passage of PL 96-511

The management of information as a resource is a subject of considerable interest and investigation. The topic is pervasive in the literature today and is receiving close attention at conferences and conventions. Further, the concept is actually being put into practice by several Federal organizations as well as other government and private institutions and corporations. In addition, many more agencies are beginning to establish Task Forces and Study Groups to determine how best to apply the precepts of information resources management (IRM) to their own organizations.

In the Federal arena, a few departments have announced reorganizations for information resources management which have stemmed from studies conducted prior to the passage of the legislation in Congress. Particularly in the Department of the Interior and the Department of the Army, some concrete steps have been taken towards implementing IRM.

The Department of the Interior has consolidated the policy and planning functions of most of its information-related functions at the Department level in an Office of Information Resources Management (OIRM). The office has already undergone a shift from a classical "stove pipe" organization in which five fairly autonomous divisions reported to a director, to an organizational emphasis on management, which consists of three basic elements: a policy formulation and planning group; an operations element; and a program evaluation group. These elements translate into seven interrelated divisions:

- . IRM Program Development
- . IRM Program Assessment
- . Project Services
- . Center for Library and Information Services
- . Telecommunications
- . Directives and Paperwork Management
- . Office of Secretary Support Services.

Within the Department of Defense, the Headquarters, Department of the Army (HQDA) has established an Office of Information Resource Management which will coordinate the setting of information policies throughout the information life cycle. The HQDA OIRM has responsibility for coordinating a HQDA-wide program for information resource management which directly involves end-users in the various functional organizations. The OIRM has designated eleven aspects of its IRM Program:

1. Information Planning
2. Information System Coordination
3. Data Element Standards
4. Data Base Administration
5. Records Management
6. Forms Management
7. Management Information Control  
(Reports Management)
8. IRM Education
9. IRM Technology Assessment
10. Information Inventory Control
11. Information Security

Many other Federal agencies, if they have not already established an IRM program, have in place most of the relevant information functions addressed by the Law (e.g., data and ADP standards, records management, statistical clearance, information collection clearance, ADP management, telecommunications management, privacy, etc.). The Law, of course, addresses improvement in the coordination and execution of these functions.

There are many benefits which may be pursued by an agency through managing its information as a resource in addition to being in compliance with the legislation. Explicit identification of and accountability for information costs can lead to better control over those costs. Better awareness of information availability and appropriate standardization can result in improved information sharing and a reduction of the reporting burden on information suppliers (e.g., other agencies, DoD employees, or the public). Coordinated information planning can provide better support to the justification and development of information systems and improvements in the ADP acquisition process. Consistent information policies can improve worker

productivity by reducing redundant or conflicting reporting and control requirements and influencing early coordination of approvals in the information systems life cycle. Many agencies are investigating IRM as a methodology for achieving these benefits.

On the inter-departmental or Government-wide level, the Office of Management and Budget (OMB) has recently reorganized to form the Office of Information and Regulatory Affairs in an attempt to consolidate OMB's role in information policy-making. Backed by Executive Order 12174, the Federal Reports Act, and other mandates, OMB is proceeding to implement the Federal Information Locator System, institute a Federal Information Collection Budget, and continue with its information collection clearance process predating the passage of the legislation.

The General Services Administration is continuing to exercise its purview over the ADP acquisition process as per the direction of PL 89-306, but is also beginning to reassess its role in the larger process of information resources management. The National Archives and Records Service (NARS) which is part of GSA and traditionally responsible for the collection, storage and disposition of Federal records, is also taking a more active stance with respect to PL 96-511. It has recently established a Technology Assessment Division (TAD) within its newly created Office of Program Development. One of the primary objectives of the TAD is to apply appropriate technology in streamlining the paperwork of the records cycle. The General Records Schedules already make provisions for the transfer of machine readable records (see Section 101-11.411-9 of the General Records Schedule, No. 20). In addition, the Government Accounting Office has embraced the IRM approach in its last 50 or so agency audits and is embedding the concept in its 5-year audit plans.

Most of these IRM initiatives, while occurring prior to the establishment of the Paperwork Reduction Act, nevertheless are closely compatible with it. The Act itself does not specifically mention IRM, but it does address improvements in the management of Federal information resources. In doing so, the Act does not attempt to usurp powers already granted under existing laws or mandates (e.g., PL 89-306, The Brook's Act), but rather it tries to consolidate existing information management activities into a more cohesive IRM concept. The new Law underscores deadlines and goals for implementation in its attempt to cut the growing cost of information in the Federal Government and to establish some accountability for managing it.

- (2) Information Resources Management Is a New Concept for Some DoD Organizations Which Is Not Uniformly Defined nor Well-Understood

That information is a costly and valuable resource has been recognized by many people for a long time. That information can be managed as a resource on an agency-wide or department-wide basis is a more recent realization that is new to many people or organizations. As a result, the IRM concept is still in its formative stages and subject to many diverse interpretations. There is no common definition of information resources management within DoD, let alone the Federal Government. Thus, there are differing opinions as to the scope of information to be managed (e.g., all information, only automated information, or only management information), the stages of the information life cycle to be included (i.e., requirements specification, acquisition, transmission, processing, storage, use, or dissemination), the functions to be performed (e.g., information systems development, telecommunications management, or archiving of records), or the organizational division of responsibilities (e.g., policy setting, management control, or operational execution).

Throughout DoD there is little common agreement on the scope, stages, functions, or responsibilities for information resources management. Authority and responsibility is fragmented into so many places that individual system designers or developers are not clear on which policies they are to comply with and at what stage in the system life cycle. Many people tend to view their role in the development or use of a system from a narrow perspective without an overt appreciation of how that role fits into the overall process of supplying, handling, or using information. Without an IRM framework there is little mechanism to control the natural tendency toward local optimization of systems to solve an immediate information need.

The Paperwork Reduction Act is an attempt to begin to develop the IRM framework on a Government-wide basis. However, as in DoD, there is not yet a common agreement as to what should constitute that framework. This is evidenced by testimony in the hearings and by the amendments to the legislation which resulted from extensive discussions on the scope and meaning of IRM. Although several definitions are explicitly stated in the new Law, there still exist many areas open to interpretation. Further guidance from OMB and Congress will be required.

The impact of this dynamic situation on DoD, understandably, is a sense of confusion as to what the legislation is trying to accomplish and how it should be implemented. Thus, in many of the Services and Components there is a reluctance to forge ahead in establishing or modifying related programs until there is uniform direction and guidance from OMB and OSD. Instead of viewing the situation from the negative, OSD should seize it as an opportunity to provide leadership to DoD and to other Federal agencies. Opportunities for coordination and communication among many previously unrelated DoD units must be created and executed. Similar opportunities exist with respect to interagency and

Department relationships across the Federal government. Because of its proven track record in internal ADP and information management areas, DoD has a chance to provide strong guidance to OMB and GSA in interpreting open sections of the Law and devising feasible measures of implementation.

There are several misconceptions concerning IRM and the Law which a uniform DoD interpretation might alleviate.

- . Data Ownership - in the context of government produced information, the "owner" of the information is generally considered to be the public at large. However, in the narrower context of a given organization such as DoD, the question of "ownership" of information relates to a complex set of organizational rights and responsibilities. The designation of a senior official(s) responsible for managing information in DoD does not imply that ownership of that data must be transferred to those individuals. As an analogy, the Comptroller does not own the financial resources of the organization which he or she manages. Data ownership rights (and responsibilities) can be established for the mission-oriented functional organizations and will be a significant issue in implementing the Law.
- . Centralized Implementation - the implementation of the philosophy of IRM and the provisions of the Law does not imply that a single central organization must be created. However, a focal point for management and leadership is required. Responsibility for effective information management can be distributed among several organizations, including the functional end-users of the information, but to be effective in DoD, IRM policy should be centralized and emanate from top management.
- . Monolithic Systems - the coordination of information systems through the management of information does not imply that a single, huge integrated data base will result. Indeed, today's trend is away from monolithic systems toward distributed processing, computer networks, and individual minicomputers and microprocessors. IRM is an approach to providing some continuity to those separate systems by managing the information which flows among them.
- . Management vs. Control - information resources management does not imply information control. IRM is a philosophy and managerial discipline which can be used to provide better managerial control over other resources (such as ADP, time, or money) by itself providing services such as information location, identification of unnecessary redundancies, facilitating the sharing of information, or quantifying the actual costs associated with information. IRM does not require that individual organizations will lose control over their information.

- . Public-Use Reporting - while the text of the legislation does emphasize the need for IRM with regard to public-use reporting, it does not exclude the benefits to be obtained by applying the principles of information resources management to other forms of information. In fact, the largest internal benefits of IRM to an agency will come from improvements in its own planning, productivity, and system development.

There is need for a uniform DoD interpretation of the Law to address these and other issues in the implementation of the Act.

IRM and the legislation is a management issue more than a technical concern. Many of the tools and techniques for improved information management exist, but they are disjoint and uncoordinated. Information systems have traditionally been designed as vertical reporting systems without adequate attention to the horizontal needs to share information sources, processing, or end-products. The resulting waste, redundancy, and time spent in reconciliation of data is costly both in individual cases and in the aggregate. The legislation is an attempt to focus management's attention on this problem.

The scope of this particular impact study has been limited to automated information and the impact of the legislation on ADP in DoD. While such a narrow perspective was necessary, given the resources available to the study, the focus of the legislation is much broader than ADP. However, automated systems is a reasonable place for DoD to begin to address the issues of information resources management because:

- . There is a large, visible cost associated with ADP in DoD
- . The trend today is to automate more and more information systems
- . Automated system requirements provide a certain structure which both identifies the problem and facilitates the solution.

The philosophy of IRM, however, emphasizes the need to expand the thinking of information system designers and developers beyond the domain of strictly automated data. Information resources management is different from information systems management, although the two are intimately related.

In the area of DoD C<sup>3</sup>I, the Law's definition of ADP and telecommunications equipment excludes equipment involved in intelligence activities, cryptologic activities related to national security, or direct command and control of military forces, or equipment embedded as an integral part of a weapons system, or which provides direct fulfillment of military or

intelligence missions. However, it should be noted that this exclusion relates primarily to Section 3504(g) where the ADP and telecommunications functions of the Director of OMB are defined. It does not specifically exclude C31 information and information systems from the other provisions of this Law. Further, it does not alter the applicability of PL 89-306. Additional clarification will be required. The IRM concepts, which are fundamental management concepts, are especially significant in areas of national importance, like C31, where control and direction are essential. It would be beneficial to the whole of DoD to create an environment in which the C31 community could share with the rest of DoD various techniques and approaches to IRM.

There is a difference in focus among managing information technology, information communication systems, and information content. They require somewhat different skills and address different problems. IRM is not an attempt to replace those three managerial disciplines but rather to benefit from the synergy obtained by addressing those existing functions from a common information resource point of view. It is this point of view that needs definition and explanation across DoD.

(3) The Law Crosses Several Disciplines and Current Organizational Boundaries within DoD with no Clear-Cut Single Assigned Responsible Agent

There are several objectives of the Paperwork Reduction Act of 1980:

- . To minimize the Federal paperwork burden
- . To minimize the cost of information to the Federal Government
- . To maximize the usefulness of information collected by the Federal Government
- . To coordinate Federal information policies and procedures
- . To ensure that automatic data processing and telecommunications technologies are acquired and used by the Federal Government in a cost-effective manner
- . To ensure that information is collected and handled by the Federal Government in a manner consistent with applicable laws relating to confidentiality, e.g., the Privacy Act.

To achieve these objectives, the Act must necessarily address several information-related disciplines, including:

- . Federal information policies, principles, standards, and guidelines



- . Information collection request clearance (e.g., forms control and reports clearance)
- . Statistical policy and coordination
- . Records management
- . Privacy and information security
- . Automatic Data Processing and Telecommunications.

The Law establishes certain goals and Federal practices in these areas without explicitly dictating how these individual disciplines should be managed or executed within a given agency. Thus, while the title of the Law narrowly focuses on paperwork, its contents address the broader issues of managing Federal information in a manner that contributes to the overall reduction of paperwork and the maximization of the cost-effectiveness of all information-related activities.

In the Services and Components of DoD, as in most other Federal agencies and departments, there is already established considerable management structure and technology for dealing with these individual disciplines. In general, however, these disciplines are not sufficiently coordinated to achieve the degree of synergy indicated in the legislation. Thus, there are redundant and sometimes conflicting policies, multiple management control mechanisms, and many diverse organizations with which DoD information system planners and implementors, for example, must deal throughout the life cycle of system development. This diverse array of disciplines has developed over the years to address individual information management needs as they have been identified. It should be noted that automatic data processing, while it is the primary focus of the current impact study, is only one of the information disciplines addressed by the legislation. The emphasis thus placed on ADP in this report should not be taken to imply a predominant position of ADP with regard to the other information disciplines.

No common organizational pattern is evident throughout the DoD Components and Services and it is concluded that the impact of the legislation on organizational structure will vary by component. In most of the components reviewed, the Comptroller organization was heavily involved with information management activities while this was less evident in the Services. At the OSD level, the Assistant Secretary of Defense (Comptroller) seems to have the policy making responsibility for most of the information disciplines with the notable exclusion of telecommunications which is the purview of ASD (C3I). Thus, at the highest levels, it would appear that OSD could readily meet the requirement of the legislation for a senior official or officials with the responsibility for enacting information resources management activities.

From the Service and Component level, however, OSD presents a fragmented image of uncoordinated information policies and activities. Thus, some DoD information systems personnel voiced concern that they must deal with several people at OSD who are not necessarily as well informed as they seemingly should be about the workings of other OSD information management activities. The Directorate for Data Automation of ASD (Comptroller) has generally maintained a low visibility, providing assistance to the Components and Services on an as requested basis. Several of the Components and Services expressed interest in earlier involvement with OSD and more visible direction from OSD in the information disciplines. The need for direction was especially requested in developing a consistent interpretation of the provisions of the legislation, where several organizations indicated that they would hesitate before implementing changes relevant to the Act until uniform DoD instructions were developed by OSD. The components generally expressed plans to continue to interface with OMB, GSA, and other agencies through OSD while the Services typically indicated their intentions to deal directly with OMB, GSA, and the other Services, preferring to interface with OSD on a policy level.

(4) The Major Areas of Concern Within DoD for Implementing the Law Focus on Questions of Authority, Scope, and Bureaucratic Inefficiencies

Several implementation concerns were expressed by DoD staff during the interview process. They raise questions that deal with authority, scope, and bureaucratic inefficiencies. These concerns fall under the main categories of: the relationship of OMB, GSA, and OSD to the DoD components and services; the telecommunications arena within DoD; ADP equipment acquisition; and the impact on management systems. These are discussed below.

Inter- and Intra-relationships of DoD Components and Services: Questions were raised as to how OMB, GSA, and OSD would relate to the DoD Components and Services in meeting the requirements of the Law. In this area, there was not general agreement on the level of involvement or thresholds for notification of intended action. Neither was there agreement on the need for or proper organizational position of a Service or Component-level Office of Information Resources Management. Although the Law specifically recognizes the complexity of the DoD organization by allowing more than one senior official in the military departments and the Office of the Secretary of Defense, it nevertheless requires that the duties and responsibilities be carried out efficiently, effectively, and economically. To fulfill this requirement, it is essential that the entire DoD organization work closely with OMB in defining and resolving their inter- and intra-relationships.

Telecommunications: there appeared to be conflicting definitions of what was meant by the term "telecommunications", ranging from the electrical interface between a terminal and its host computer to the vast network of DoD voice communications. Further, the degree of coordination among ADP and telecommunications offices varied by Component and among the Services. Indeed, in one reviewed agency, the ADP and Telecommunications organizations were preparing responses to the legislation independently of and without knowledge of each other. In the final version of the Law, "telecommunications" is not well defined. As a result, the entire set of functions covered by the term must be carefully monitored and tactfully handled, both within DOD and across the Federal Government as a whole.

ADP Equipment Acquisition: here, the opinions ranged from suggesting that the acquisition of ADP equipment should be a separate issue from the management of information to the observation that the rapidly improving price/performance ratio of information technologies decreases the significance of the actual equipment costs in the overall cost of developing an information system. Furthermore, there was concern that, in the past, GSA had focused on reviewing hardware acquisitions without sufficient understanding of the relevant mission/software environment (from which they were specifically precluded). Some mechanism was requested for GSA involvement with, if not control over, the development of system requirements based on an understanding, if not approval, of the mission needs of the requestor. There is no such mechanism mentioned in PL 96-511. The language of the Law is rather vague on this subject. The area of ADP equipment acquisition not only bears watching, but also requires active participation from OSD.

Management Systems: with regard to the potential for bureaucratic inefficiencies in the IRM process, concerns were raised about the impact which the review and approval process would have on the productivity of DoD personnel, the resources that would be required to implement the program and where those resources would come from, and demonstrated inefficiencies in dealing with central Federal agencies in the past. There was a general aversion to further controls and management reviews being placed on the already heavily reviewed system development process. However, no studies were cited which compared the cost of information management to the life cycle savings resulting from reduced redundancy and averting false starts as a result of managing information.

It was pointed out by several sources that in DoD there is apparently a form of trichotomy among the disciplines of automatic data processing, telecommunications, and traditional information (content) management. These three disciplines have tended to function somewhat autonomously from each other, and yet the areas of overlap in terms of technology, philosophy, and personnel

skills have been steadily increasing. A large impact of the new legislation will be the further convergence of policies and procedures in these areas. The successful blending of these disciplines will require careful planning and agreement upon a set of common goals. The relatively ambitious implementation schedule embodied in the legislation and the posture adopted at OMB increase the importance of addressing this issue early. Officials at OMB have already begun to integrate paperwork, ADP and telecommunications. They indicated in recent interviews that they see the areas as one integrated information policy arena. Failure to fulfill responsibilities connected to any of these areas could obstruct agency activities in the other areas. Thus, it is essential that OSD address these areas and provide integration as directed by the Law.

### 3. STUDY RECOMMENDATIONS

The recommendations presented in this section stem from the conclusions drawn in the previous section and the findings and analysis of the study team. These recommendations are offered not as specific changes which OSD ought to make but as a vehicle for presenting alternative implementation strategies for consideration. The recommendations, which are discussed individually below, include:

- . OSD Should Work to Establish Closer Coordination Among Its Offices Directly Involved with the Implementation of the Law
- . OSD Should Plan to Work Closely with OMB, GSA, GAO, and Congress in Shaping the Implementation of the Federal IRM Program
- . OSD Should Take the Lead in Defining a Uniform DoD-wide Interpretation of the Provisions of the Law
- . OSD Should Prepare for a More In-Depth Study of the Implementation of Information Resources Management in DoD.

Each of these general recommendations is discussed below along with specific alternatives to be considered.

#### (1) OSD Should Work to Establish Closer Coordination Among Its Offices Directly Involved with the Implementation of the Law

The Law may potentially directly impact several offices within OSD including the Directorate for Data Automation, the Directorate for Management Information Control and Analysis, the Correspondence and Directive Directorate, and the Office of the Assistant Secretary of Defense (Command, Control, Communications, and Intelligence). An expressed purpose of the Law is to cause closer ties among these areas for the purposes of developing better coordinated information policies.

A joint OSD study team could be established to determine explicit areas of interface and to identify relevant policy concepts for management attention. This study team would address ways to present a more unified image to the Services and Components to facilitate their interaction with OSD in the areas of coordinated information policies and the information resource management review and approval process.

The Directorate for Management Information Control and Analysis may wish to involve the Directorate for Data Automation more closely in the DIALS implementation and in tracking or commenting upon the development of FILS at OMB. As the concept of an information locator and data dictionary system moves toward large-scale operation (even, perhaps, toward distributed systems) the skills of the Data Automation Directorate in Life Cycle Management and large-scale system development may be beneficial to the DIALS effort. Furthermore, the capability of using DIALS as a DoD-wide dictionary system in support of software development projects should also be investigated. Consideration should be given to the interface of existing DoD dictionary systems with DIALS in anticipation of future data element reporting requirements. Similarly, the role of FILS should also be considered and the need for direct interfaces between DoD information systems and FILS should be investigated.

Similarly, the Directorate for Data Automation should be more closely involved with the data element standardization program of the Management Information Control and Analysis Directorate. Standard data elements are an important aspect of systems development as well as requirements specification. Closer coordination of data element standards with ADP policies and procedures should contribute to their use and implementation early in the system life cycle in the various service and component organizations in keeping with the proposed legislation. Standards for codes and data values should also be addressed.

The opportunity to work more closely together in sharing policy concepts and information management tools should be mutually beneficial to the organizations within DoD and to the Department as a whole. Clearly, the C<sup>3</sup>I community has its own special information management requirements, but many of the principles of information resources management as defined for the management information systems environment may also be applicable to the information systems of the command and control and intelligence communities. An IRM implementation information exchange program would provide a forum for sharing ideas and experiences while still permitting the necessary security precautions.

- (2) OSD Should Plan to Work Closely with OMB, GSA, GAO, and Congress in Shaping the Implementation of the Federal IRM Program

DoD has had a considerable voice in shaping the legislation in Congress; however, there remains even further opportunity for DoD to influence, guide, and assist the interpretation and implementation of the provisions of the Law at the Federal level as the new Administration takes office.

It is in DoD's own best interest to define openly its interpretation of the Law so it is clear to OMB, GSA, and Congress how DoD intends to proceed. Much of the Act is still subject to interpretation, such as the actual policy statements, review procedures, delegation of authority, and disciplines requiring priority attention. OMB is tasked by the Law to establish and define the Federal IRM Program, and OMB needs help in this endeavor. An evolutionary period of transition should be expected while OMB builds the necessary staff, determines the proper level of delegation, and establishes priorities for policy generation. OMB has called upon the Federal community at large for support during this period so as to establish a long-standing relationship with the information disciplines in the various departments.

In a discussion before the Interagency Committee for ADP on February 10th, OMB officials declared their intention to move slowly and cooperatively within the Federal community to implement the Law. OMB expects agencies to assume responsibility and take initiatives to implement the Law in their own contexts. They have been most impressed with the IRM program of the Department of the Army and intend to use the program as a model and Army officials as advisors. In addition, OMB officials expect agency officials to analyze and communicate the difficulties in implementing the Law so they can help resolve such difficulties. At this point the implementation remains flexible.

DoD may want to offer representatives to participate in IRM task forces to help OMB shape the Federal program. DoD already has established a reputation for leadership in the information disciplines and has much to offer in the way of knowledgeable and skilled personnel, experience in information policies and programs, and specific tools to support information resource management. DoD may even want to go beyond task force participation to become a lead agency for operating some portion of the total Federal IRM Program. The commitment here, of course, would be somewhat larger, but serving as a lead agency itself might be an opportunity for DoD to resolve some of its problems with the way related programs have been operated at the Federal level in the past.

OMB, historically, has deliberately remained a relatively small organization and has tended to delegate much of the operational responsibilities of Federal programs to other agencies. In the area of automatic data processing and the review and approval of the acquisition of ADP equipment, the General Services Administration has been heavily involved. GSA can be

expected to have a continued central role in ADP matters under the new legislation. In particular, the Act calls for GSA participation with OMB in developing a five-year plan for meeting the automatic data processing and telecommunications needs of the Federal Government. DoD, presumably, will want to work closely with OMB and GSA in the development of this plan as it impacts DoD.

OMB is following the requirements and calendar established under PL 96-511 (see Exhibit V-1). Officials are currently working on guidelines of responsibilities and functions for establishing a single IRM official per agency. Their deadline is April 1, 1981. Although other tasks having April 1 deadlines are listed in Exhibit V-1, OMB spokesmen reported no specific details on these. They did, however, indicate that their next priority is to develop audit standards and requirements.

In the area of audit and review of agency compliance with the provisions of the Act, OMB and GSA are mandated by the legislation to selectively review, at least once every three years, the information management activities of each agency to ascertain their adequacy and efficiency. The findings of this review shall be reported to the respective agency head as well as the appropriate committees in Congress having jurisdiction over legislation and appropriations relating to the operations of the agency involved. In addition, the Comptroller General of the United States and the Government Accounting Office can be expected to continue its auditing and review role with respect to the overall program implementation as well as independent reviews of individual agencies.

OSD should participate closely with OMB, GSA, GAO, Congress, and other Federal organizations as the details of the implementation of the law are being developed over the next few months. Furthermore, OSD should plan to allocate resources for establishing a close working relationship with such organizations during the operational phases of the program.

(3) OSD Should Take the Lead in Defining a Uniform DoD-Wide Interpretation of the Provisions of the Law

Many of the Components and Services expressed their plans to delay implementation of the provisions of the Act until they received firm guidance and interpretation from OSD. This guidance could take the form of

- . Development of guidelines for establishing the senior official(s) in OSD and the Components and Services
- . Identification of key issues to be resolved

Analysis of OMB Tasks and Responsibilities  
Under the Paperwork Reduction Act of 1980  
(P.L. 96-511)

(Source: OMB Office of Information and Regulatory Affairs)

<u>DESCRIPTION</u>	<u>CITATION(S)</u>	<u>LEGISLATIVE DEADLINE</u>
Identify productivity initiatives using technology and promote use of information processing technology	3504(g) (4) 3505(3) (B)	4/1/83
Develop a program to enforce Federal information processing standards; revitalize standards	3504(g) (1) 3505(3) (C)	4/1/83
Develop ADP/Telecommunications Five-Year plan	3505(3) (E)	4/1/83
Provide policy and guidance, monitor compliance, and propose legislation to remove inconsistencies for privacy, confidentiality, and disclosure of information	3504(f) 3505(3) (F)	4/1/83
Annually report to Congress on major paperwork reduction activities and initiate changes needed in legislation	3504(b) (2) 3504(g) (5) 3514	(annual)
Issue guidance to agencies on establishing their single official and reorganizing IRA associated functions	3506	4/1/81
Establish audit standards and requirements for most information systems and assign responsibility for multi-agency audits	3505(2) (a)	4/1/82
Coordinate and make uniform Federal information policies and practices	3504(a) 3504(b) (1-4) 3504(b) (6) 3505(3) (A) 3510(a) 3516 3517	
Review agency information management activities; review or evaluate each discipline; and report inspection results to Congress	3504(b) (5) 3504(d) (4) 3504(e) (2) 3504(f) (3) 3504(g) (2) 3513(a) 3513(b)	4/1/84



Analysis of OMB Tasks and Responsibilities  
Under the Paperwork Reduction Act of 1980  
(P.L. 96-511)

<u>DESCRIPTION</u>	<u>CITATION(S)</u>	<u>LEGISLATIVE DEADLINE</u>
Develop and oversee ADP/telecommunications policy and acquisition	3504(g) (1) 3504(g) (3) 3504(g) (5)	
Settle disputes between GSA and agencies under the Brooks Act (PL 89-306)	3504(g) (2)	
Coordinate records management with other related information programs; provide advice and assistance to GSA	3504(e) (1) 3504(e) (3)	
Oversee information research practices	3504(b) (6)	
GAO Reports	3519	
Funding and Implementing Planning	Administrative	
Define IRA structure; make appropriate delegations; arrange for transfer of personnel	3503	4/1/81
Oversee Federal Reports Act Approval Process	3504(c) (1-4) 3504(h) 3507(a) (3) 3507(b,d) 3508 3517 3504(c) (5) 3505(1) 3505(2) (e) 3514	as occurs as occurs as occurs  4/1/81 4/1/82 annually

Analysis of OMB Tasks and Responsibilities  
Under the Paperwork Reduction Act of 1980  
(P.L. 96-511)

<u>DESCRIPTION</u>	<u>CITATION(S)</u>	<u>LEGISLATIVE DEADLINE</u>
Complete actions on CFP recommendations	3504(c) (6) 3505(3) (D)	4/1/83
Review reports of agencies previously exempt from FRA	3512	12/31/81
Delegate clearance authority	3507(e)	
Issue guidance and regulations	3516 3517	
FILS	3504(b) (4) 3504(c) (7) 3505(2) (B) 3505(2) (C) 3505(2) (D) 3509 3511	4/1/82 4/1/82 4/1/82
Develop long-range plans	3504(d) (1)	
Develop government-wide statistical policies	3504(d) (3)	
Coordinate statistical functions	3504(d) (2)	

- . Interpretation of the intent of the legislation
- . Establishment of coordinated information policies
- . Pronouncement of specific implementation procedures
- . Identification of priorities
- . Definition of terminology
- . Announcement of the availability of relevant tools and machinery
- . Suggested models of the functions and organizational inter-relationships which may be required.

Of course, not all of the organizations within DoD are waiting for specific OSD guidance before proceeding to establish a better approach to managing their information resources. OSD may want to get more closely involved with programs like that in the Headquarters, Department of the Army to learn from their experiences and to coordinate the development of similar programs throughout DoD.

One approach to building a closer working relationship with the Components and Services in this area is to establish an IRM Task Force of personnel from across DoD to address IRM-related goals, objectives, problems, and implementation steps. Such a task force not only would provide Service and Component input into the definition process but would permit feedback to those organizations while establishing a core of individuals with a similar understanding of the legislation and its implementation throughout DoD. Such a task force could be developed in conjunction with the IRM impact study described in Recommendation 4 of this section or it could be an outgrowth of that effort. Presumably the task force could become a long-term standing committee that could address operational issues beyond the initial implementation of the legislation, thus providing a forum for the identification and resolution of ADP and information-related issues which cross organizational boundaries within DoD.

OSD should carefully consider the separation of policy-making activities under the Law from the more operationally-oriented tasks such as actual records storage, operation of a central information locator service, or the maintenance of data element standards. In this regard, OSD has employed the lead agency concept within DoD for operational programs in the past and may wish to continue in that mode with the implementation of the Law. Thus, OSD may want to choose selected agencies to run the operational programs and to maintain program reporting and review information for all of DoD. OSD would thus reserve for itself the development of information policies and the coordination of these related information programs.

The Law presents DoD with an opportunity for improving the management and use of its information resources. In this regard, OSD has several efforts currently ongoing to which the legislation will lend credence and support. In particular, the concept of information system Life Cycle Management and the determination of the cost of information systems across their total life cycle is fundamentally compatible with the intent of the legislation toward more cost-effective development and use of information systems within the department or throughout the Federal Government. OSD may want to work to define the relationship of the legislation to such existing programs in order to provide a stronger basis for their continued, or even enhanced, level of support.

The Law specifically requires that each agency, among other activities, systematically inventory its major information systems to ensure that its information management policies are being put into practice and to ensure that its systems do not overlap each other or those of other agencies. In this regard, there will need to be developed a close interface between the information planning function, which addresses the requirements for, location of, and responsibilities for information, with the information systems planning function which addresses the functional requirements, operational characteristics, and information flows of information systems. DoD will want to be able to tie its information systems closely to the mission statements of its individual agencies and to be in a position to recognize unnecessary redundancies or unnecessary differences for resolution. OSD, from its perspective at the inter-Service/Component level will need to establish the mechanisms whereby this inventory and review can be accomplished.

In the area of data element management, OSD will want to continue its leadership role. The current direction of data element registration appears to be a workable compromise against attempts to standardize all data elements. Again, the focus of OSD on developing inter-Service/Component standards should permit continued autonomy within the Services and Components while permitting some basis of compatibility across organizations. To support this effort, OSD will want to continue with the development of tools such as DIALS and will need to work closely with OMB in defining the appropriate interface mechanism with FILS. An open question is whether the interface to FILS for all DoD Services and Components should come through OSD, whether a DoD standard locator system should be developed and deployed, or whether each agency will develop its own interface to FILS. In addition, other DoD developed information management tools such as LOGDRMS will need to be evaluated, encouraged, and made available across DoD.

Another intent of the Law is to foster the application and integration of information technologies. To this end, OSD may

choose to institute or monitor some selected pilot projects aimed at merging several of these technologies to determine the synergistic benefits as well as the particular technical problems involved. Other projects aimed at bringing together information from a variety of sources and information systems would also serve to identify critical problem areas as well as demonstrate the feasibility and benefits of such an approach. Several projects of both types are already underway within DoD (e.g., the Army), and OSD should give consideration to how the results of these localized experiments can be exploited for DoD as a whole.

In general, the interviews with the DoD Components and Services indicated a desire for more leadership and a common direction with a clarification of responsibilities being, perhaps, more important than any reorganization. The related information disciplines are somewhat fragmented within the Services and Components themselves, but each is recognizing more and more the need to work more closely with the others. In this regard, DoD must remember not to exclude the traditional category of end-users of information from the planning and management process. Explicit roles for end-users in requirements specification, system design, approval, and use will need to be defined and incorporated into the ADP and information planning process.

(4) OSD Should Prepare for a More In-Depth Study of the Implementation of Information Resources Management in DoD

As indicated at the outset of this chapter, this initial impact study was necessarily limited in scope to a brief look at the potential impact of the Paperwork Reduction Act on automatic data processing in DoD. A major finding of this study, however, has been that the concept of information resources management embodied in the Law appears to be an area worthy of additional study for possible application throughout the Department of Defense, regardless of the legislative process. Further study is needed to address questions of organizational responsibilities, scope of the eventual program, relevant policy revisions, and appropriate tool development which were beyond the scope of the present study.

This more comprehensive study could be undertaken as a full-scale impact study described in the original project plan for the DoD ADP Long-Range Planning Project. Such a study could draw upon DoD personnel from a variety of disciplines and organizations either as active members of the study team or as a study advisory group. This approach not only would provide a mix of disciplinary skills and organizational points of view but would serve as an initial training ground for conveying the DoD IRM concept back to the Components and Services.

While the impact study would be necessarily focused on ADP as part of the ADP Long-Range Planning Project, consideration should be given to the expected points of interface with other disciplines that contribute to information resource management. In particular, the study should identify automated tools for IRM and possible pilot projects where these tools can be tested to determine their general application. Further, experiments should be designed for testing the integration of various information technologies such as data processing, word processing, telecommunications, electronic mail, and micrographic storage and retrieval.

In addition, the impact study could provide the manpower for assessing the status of IRM programs and the implementation of the Law in other Federal departments and agencies, thus providing input to DoD's own planning process. Further, the study could address the availability of automated aids and commercial products to facilitate the management of information. Through the mechanism of a full-scale impact study, OSD could foster the implementation of the Law throughout DoD.

The treatment of information as a resource is a clear objective of the new Law. The management of this resource will require individuals skilled in specific techniques and knowledgeable of the implications of the relevant policies and procedures. To this end, the DoD impact study may also investigate the feasibility of developing a career path for DoD military and civilian personnel in information resources management. Such a path would encompass some existing occupational specialties in the ADP field and others without replacing those specialties. The study would consult with the Federal Office of Personnel Management to define such a career path and to determine the specifics of how it might be implemented.

IRM training programs are beginning to appear in the DoD Computer Institute, the USDA Graduate School, OPM, and selected universities, such as American, Syracuse, and Southeastern, to provide training with an IRM focus in addition to more traditional ADP training. The impact study may monitor such training programs both as potential training for DoD employees and as models for internally developed IRM courses. Particular attention should be given to the cross-fertilization of information management with ADP so that DoD ADP analysts and managers are more aware of the need to interface with information (content) managers and information managers are made more familiar with ADP tools and techniques which can be used to support the information management process.

A central role which OSD can play in the implementation of the legislation within DoD is to conduct an educational campaign aimed at explaining the information resource management concept, Federal and DoD IRM policies, and the provisions of the

legislation. Several possible mechanisms have been identified including the DoD IRM Task Force, the ADP Long-Range Planning Impact Study, studies of individual pilot projects, and reviews of existing and planned information systems. The impact study could address the benefits and problems of each approach. The ultimate objective would be to begin a dialog on the problems and strategies for implementing the provisions of the legislation. Such a dialog should serve to identify major obstacles which OSD can relate to OMB and to clarify some issues and dispel some of the concerns expressed by the Services and Components with regard to the Act.

#### 4. SUGGESTED PRIORITIES FOR IMPLEMENTATION

As suggested throughout this chapter, OSD should view P.L. 96-511 as an opportunity to lead DoD in organizing and implementing its information management activities. The previous sections discussed a full range of implications of the Law. In the following list are action items recommended for the current year.

##### Within the next 3-6 months:

- . Designate senior official(s) to carry out the responsibilities of the Law
- . Define DoD-wide IRM objectives
- . Assess the impact of P.L. 96-511 responsibilities on
  - Organizational structure
  - Job descriptions, accountability, and performance
  - Career development
- . Work closely with OMB, GSA, and other agencies so as to guide the interpretation and implementation of the Law
- . Examine the information production life cycle, especially in relation to paperwork and ADP life cycles.

##### Within the next year:

- . Plan an incremental, phased approach to organizational change supportive of IRM as a DoD-wide management philosophy
- . Identify and develop methodologies to support IRM from a DoD-wide perspective, e.g. costing information units and auditing information systems
- . Examine policies and directives as to change or enhancements needed to fulfill P.L. 96-511 requirements, especially the LCM policy for AIS

- Assess the need for and mechanisms for accomplishing IRM-related education and training.

In summary, DoD should not be adversely impacted by PL 96-511. Much of the fundamental policies, functions, and tools are already in place throughout DoD to facilitate compliance with the Law. The major impact should not be the need to develop new policies but rather the need to consider the IRM approach in each policy area. The key aspect of importance to be addressed is the question of getting it all to work toward a common DoD objective. Here, the need for better cooperation and coordination within OSD and between OSD and the DoD Components and Services is paramount to successful management of DoD's information resources. The information resources management concept can provide a framework and vocabulary for addressing this cooperation.

With respect to the Paperwork Reduction Act itself, OSD should view the enactment of the legislation as an opportunity to renew its efforts in establishing this cooperative environment and to give added impetus to many of its existing programs in the ADP and information management area. DoD needs leadership and direction in implementing the provisions of the law. OSD can fill that role. In addition, OMB, GSA, and other central agencies will need help in defining and prioritizing the implementing policies and procedures at a Federal level. OSD has the opportunity to influence the Federal direction in this area by participating in the early formulation of these concepts.

Some additional resources may be required to develop and lead the program within OSD. These resources do not have to be substantial since many of the required functions are already being performed as part of existing programs. Active involvement of personnel from the DoD Components and Services can not only provide some of the additional manpower that may be required, but will contribute to improving the level of communication and cooperation throughout DoD.



# **APPENDIX**

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## **PAPERWORK REDUCTION ACT OF 1980**

Public Law 96-511  
96th Congress

Dec. 11, 1980  
[H.R. 4410]

An Act

To reduce paperwork and enhance the economy and efficiency of the Government and the private sector by improving Federal information policymaking, and for other purposes.

Paperwork  
Reduction Act of  
1980  
44 USC 101 note.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Paperwork Reduction Act of 1980".  
Sec. 2 (a) Chapter 35 of title 44, United States Code, is amended to read as follows:

"CHAPTER 35—COORDINATION OF FEDERAL  
INFORMATION POLICY

- "Sec. 3501. Purpose.  
"3502. Definitions.  
"3503. Office of Information and Regulatory Affairs.  
"3504. Authority and functions of Director.  
"3505. Assignment of tasks and priorities.  
"3506. Federal agency responsibilities.  
"3507. Public information collection activities—submission to Director; approval and delegation.  
"3508. Determination of necessity for information; hearing.  
"3509. Designation of central collection agency.  
"3510. Cooperation of agencies in making information available.  
"3511. Establishment and operation of Federal Information Locator System.  
"3512. Public protection.  
"3513. Director review of agency activities; reporting; agency response.  
"3514. Administrative review.  
"3515. Administrative review.  
"3516. Rules and regulations.  
"3517. Consultation with other agencies and the public.  
"3518. Effect on existing laws and regulations.  
"3519. Access to information.  
"3520. Authorization of appropriations.

44 USC 3601.

"§ 3501. Purpose

"The purposes of this chapter is—

- "(1) to minimize the Federal paperwork burden for individuals, small businesses, State and local governments, and other persons;  
"(2) to minimize the cost to the Federal Government of collecting, maintaining, using, and disseminating information;  
"(3) to maximize the usefulness of information collected by the Federal Government;  
"(4) to coordinate, integrate and, to the extent practicable and appropriate, make uniform Federal information policies and practices;  
"(5) to ensure that automatic data processing and telecommunications technologies are acquired and used by the Federal Government in a manner which improves service delivery and program management, increases productivity, reduces waste and fraud, and, wherever practicable and appropriate, reduces the

information processing burden for the Federal Government and for persons who provide information to the Federal Government; and

"(6) to ensure that the collection, maintenance, use and dissemination of information by the Federal Government is consistent with applicable laws relating to confidentiality, including section 552a of title 5, United States Code, known as the Privacy Act.

"§ 3502. Definitions

"As used in this chapter—

"(1) the term 'agency' means any executive department, military department, Government corporation, Government controlled corporation, or other establishment in the executive branch of the Government (including the Executive Office of the President), or any independent regulatory agency, but does not include the General Accounting Office, Federal Election Commission, the governments of the District of Columbia and of the territories and possessions of the United States, and their various subdivisions, or Government-owned contractor-operated facilities including laboratories engaged in national defense research and production activities;

"(2) the terms 'automatic data processing,' 'automatic data processing equipment,' and 'telecommunications' do not include any data processing or telecommunications system or equipment, the function, operation or use of which—

"(A) involves intelligence activities;

"(B) involves cryptologic activities related to national security;

"(C) involves the direct command and control of military forces;

"(D) involves equipment which is an integral part of a weapon or weapons system; or

"(E) is critical to the direct fulfillment of military or intelligence missions, provided that this exclusion shall not include automatic data processing or telecommunications equipment used for routine administrative and business applications such as payroll, finance, logistics, and personnel management;

"(3) the term 'burden' means the time, effort, or financial resources expended by persons to provide information to a Federal agency;

"(4) the term 'collection of information' means the obtaining or soliciting of facts or opinions by an agency through the use of written report forms, application forms, schedules, questionnaires, reporting or recordkeeping requirements, or other similar methods calling for either—

"(A) answers to identical questions posed to, or identical reporting or recordkeeping requirements imposed on, ten or more persons, other than agencies, instrumentalities, or employees of the United States; or

"(B) answers to questions posed to agencies, instrumentalities, or employees of the United States which are to be used for general statistical purposes;

"(5) the term 'data element' means a distinct piece of information such as a name, term, number, abbreviation, or symbol;

44 USC 3602.

"(6) the term 'data element dictionary' means a system containing standard and uniform definitions and cross references for commonly used data elements;

"(7) the term 'data profile' means a synopsis of the questions contained in an information collection request and the official name of the request, the location of information obtained or to be obtained through the request, a description of any compilations, analyses, or reports derived or to be derived from such information, any record retention requirements associated with the request, the agency responsible for the request, the statute authorizing the request and any other information necessary to identify, obtain, or use the data contained in such information;

"(8) the term 'Director' means the Director of the Office of Management and Budget;

"(9) the term 'directory of information resources' means a catalog of information collection requests, containing a data profile for each request;

"(10) the term 'independent regulatory agency' means the Board of Governors of the Federal Reserve System, the Civil Aeronautics Board, the Commodity Futures Trading Commission, the Consumer Product Safety Commission, the Federal Communications Commission, the Federal Deposit Insurance Corporation, the Federal Energy Regulatory Commission, the Federal Home Loan Bank Board, the Federal Maritime Commission, the Federal Trade Commission, the Interstate Commerce Commission, the Mine Enforcement Safety and Health Review Commission, the National Labor Relations Board, the Nuclear Regulatory Commission, the Occupational Safety and Health Review Commission, the Postal Rate Commission, the Securities and Exchange Commission, and any other similar agency designated by statute as a Federal independent regulatory agency or commission;

"(11) the term 'information collection request' means a written report form, application form, schedule, questionnaire, reporting or recordkeeping requirement, or other similar method calling for the collection of information;

"(12) the term 'information referral service' means the function that assists officials and persons in obtaining access to the Federal Information Locator System;

"(13) the term 'information systems' means management information systems;

"(14) the term 'person' means an individual, partnership, association, corporation, business trust, or legal representative, an organized group of individuals, a State, territorial, or local government or branch thereof, or a political subdivision of a State, territory, or local government or a branch of a political subdivision;

"(15) the term 'practical utility' means the ability of an agency to use information it collects, particularly the capability to process such information in a timely and useful fashion; and

"(16) the term 'recordkeeping requirement' means a requirement imposed by an agency on persons to maintain specified records.

44 USC 3602.  
Establishment.

"§ 3503. Office of Information and Regulatory Affairs

"(a) There is established in the Office of Management and Budget an office to be known as the Office of Information and Regulatory Affairs

Administrator,  
appointment.

"(b) There shall be at the head of the Office an Administrator who shall be appointed by, and who shall report directly to, the Director. The Director shall delegate to the Administrator the authority to administer all functions under this chapter, except that any such delegation shall not relieve the Director of responsibility for the administration of such functions. The Administrator shall serve as principal adviser to the Director on Federal information policy.

"§ 3504. Authority and functions of Director

"(a) The Director shall develop and implement Federal information policies, principles, standards, and guidelines and shall provide direction and oversee the review and approval of information collection requests, the reduction of the paperwork burden, Federal statistical activities, records management activities, privacy of records, interagency sharing of information, and acquisition and use of automatic data processing telecommunications, and other technology for managing information resources. The authority under this section shall be exercised consistent with applicable law.

"(b) The general information policy functions of the Director shall include—

"(1) developing and implementing uniform and consistent information resources management policies and overseeing the development of information management principles, standards, and guidelines and promoting their use;

"(2) initiating and reviewing proposals for changes in legislation, regulations, and agency procedures to improve information practices, and informing the President and the Congress on the progress made therein;

"(3) coordinating, through the review of budget proposals and as otherwise provided in this section, agency information practices;

"(4) promoting, through the use of the Federal Information Locator System, the review of budget proposals and other methods greater sharing of information by agencies;

"(5) evaluating agency information management practices to determine their adequacy and efficiency, and to determine compliance of such practices with the policies, principles, standards, and guidelines promulgated by the Director; and

"(6) overseeing planning for, and conduct of research with respect to, Federal collection, processing, storage, transmission, and use of information.

"(c) The information collection request clearance and other paperwork control functions of the Director shall include—

"(1) reviewing and approving information collection requests proposed by agencies;

"(2) determining whether the collection of information by an agency is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility for the agency;

"(3) ensuring that all information collection requests—

"(A) are inventoried, display a control number and, when appropriate, an expiration date;

"(B) indicate the request is in accordance with the clearance requirements of section 3507; and

"(C) contain a statement to inform the person receiving the request why the information is being collected, how it is to be used, and whether response to the request are voluntary, required to obtain a benefit, or mandatory.

Post, p. 2815

Paperwork  
Control  
functions

44 USC 3504.

Pub. p. 2820

"(4) designating as appropriate, in accordance with section 3509, a collection agency to obtain information for two or more agencies;

"(5) setting goals for reduction of the burdens of Federal information collection requests;

"(6) overseeing action on the recommendations of the Commission on Federal Paperwork; and

"(7) designing and operating, in accordance with section 3511, the Federal Information Locator System.

"(i) The statistical policy and coordination functions of the Director shall include—

"(1) developing long range plans for the improved performance of Federal statistical activities and programs;

"(2) coordinating, through the review of budget proposals and as otherwise provided in this section, the functions of the Federal Government with respect to gathering, interpreting, and disseminating statistics and statistical information;

"(3) developing and implementing Government-wide policies, principles, standards, and guidelines concerning statistical collection procedures and methods, statistical data classification, and statistical information presentation and dissemination; and

"(4) evaluating statistical program performance and agency compliance with Government-wide policies, principles, standards, and guidelines.

"(e) The records management functions of the Director shall include—

"(1) providing advice and assistance to the Administrator of General Services in order to promote coordination in the administration of chapters 29, 31, and 33 of this title with the information policies, principles, standards, and guidelines established under this chapter;

"(2) reviewing compliance by agencies with the requirements of chapters 29, 31, and 33 of this title and with regulations promulgated by the Administrator of General Services thereunder; and

"(3) coordinating records management policies and programs with related information programs such as information collection, statistics, automatic data processing and telecommunications, and similar activities.

"(f) The privacy functions of the Director shall include—

"(1) developing and implementing policies, principles, standards, and guidelines on information disclosure and confidentiality, and on safeguarding the security of information collected or maintained by or on behalf of agencies;

"(2) providing agencies with advice and guidance about information security, restriction, exchange, and disclosure; and

"(3) monitoring compliance with section 552a of title 5, United States Code, and related information management laws.

"(g) The Federal automatic data processing and telecommunications functions of the Director shall include—

"(1) developing and implementing policies, principles, standards, and guidelines for automatic data processing and telecommunications functions and activities of the Federal Government, and overseeing the establishment of standards under section 111(f) of the Federal Property and Administrative Services Act of 1949;

"(2) monitoring the effectiveness of, and compliance with, directives issued pursuant to sections 110 and 111 of such Act of

44 USC 2901 et seq., 2101 et seq., 2501 et seq.

40 USC 719

1949 and reviewing proposed determinations under section 111(g) of such Act;

"(3) providing advice and guidance on the acquisition and use of automatic data processing and telecommunications equipment, and coordinating, through the review of budget proposals and other methods, agency proposals for acquisition and use of such equipment;

"(4) promoting the use of automatic data processing and telecommunications equipment by the Federal Government to improve the effectiveness of the use and dissemination of data in the operation of Federal programs; and

"(5) initiating and reviewing proposals for changes in legislation, regulations, and agency procedures to improve automatic data processing and telecommunications practices, and informing the President and the Congress of the progress made therein.

"(h)(1) As soon as practicable, but no later than publication of a notice of proposed rulemaking in the Federal Register, each agency shall forward to the Director a copy of any proposed rule which contains a collection of information requirement and upon request, information necessary to make the determination required pursuant to this section.

"(2) Within sixty days after the notice of proposed rulemaking is published in the Federal Register, the Director may file public comments pursuant to the standards set forth in section 3508 on the collection of information requirement contained in the proposed rule.

"(3) When a final rule is published in the Federal Register, the agency shall explain how any collection of information requirement contained in the final rule responds to the comments, if any, filed by the Director or the public, or explain why it rejected those comments.

"(4) The Director has no authority to disapprove any collection of information requirement specifically contained in an agency rule, if he has received notice and failed to comment on the rule within sixty days of the notice of proposed rulemaking.

"(5) Nothing in this section prevents the Director, in his discretion—

"(A) from disapproving any information collection request which was not specifically required by an agency rule;

"(B) from disapproving any collection of information requirement contained in an agency rule, if the agency failed to comply with the requirements of paragraph (1) of this subsection; or

"(C) from disapproving any collection of information requirement contained in a final agency rule, if the Director finds within sixty days of the publication of the final rule that the agency's response to his comments filed pursuant to paragraph (2) of this subsection was unreasonable.

"(D) from disapproving any collection of information requirement where the Director determines that the agency has substantially modified in the final rule the collection of information requirement contained in the proposed rule where the agency has not given the Director the information required in paragraph (1), with respect to the modified collection of information requirement, at least sixty days before the issuance of the final rule.

"(6) The Director shall make publicly available any decision to disapprove a collection of information requirement contained in an agency rule, together with the reasons for such decision.

"(7) The authority of the Director under this subsection is subject to the provisions of section 3507(c).

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Pub. 2819

"(8) This subsection shall apply only when an agency publishes a notice of proposed rulemaking and requests public comments.

"(9) There shall be no judicial review of any kind of the Director's decision to approve or not to act upon a collection of information requirement contained in an agency rule.

41 USC 3506

"§ 3506. Assignment of tasks and deadlines

"In carrying out the functions under this chapter, the Director shall—

"(1) upon enactment of this Act—

"(A) set a goal to reduce the then existing burden of Federal collections of information by 15 per centum by October 1, 1982; and

"(B) for the year following, set a goal to reduce the burden which existed upon enactment by an additional 10 per centum;

"(2) within one year after the effective date of this Act—

"(A) establish standards and requirements for agency audits of all major information systems and assign responsibility for conducting Government-wide or multiagency audits, except the Director shall not assign such responsibility for the audit of major information systems used for the conduct of criminal investigations or intelligence activities as defined in section 4-206 of Executive Order 12036, issued January 24, 1978, or successor orders, or for cryptologic activities that are communications security activities;

"(B) establish the Federal Information Locator System;

"(C) identify areas of duplication in information collection requests and develop a schedule and methods for eliminating duplication;

"(D) develop a proposal to augment the Federal Information Locator System to include data profiles of major information holdings of agencies used in the conduct of their operations which are not otherwise required by this chapter to be included in the System; and

"(E) identify initiatives which may achieve a 10 per centum reduction in the burden of Federal collections of information associated with the administration of Federal grant programs; and

"(3) within two years after the effective date of this Act—

"(A) establish a schedule and a management control system to ensure that practices and programs of information handling disciplines, including records management, are appropriately integrated with the information policies mandated by this chapter;

"(B) identify initiatives to improve productivity in Federal operations using information processing technology;

"(C) develop a program to (i) enforce Federal information processing standards, particularly software language standards, at all Federal installations; and (ii) revitalize the standards development program established pursuant to section 755(n)(2) of title 40, United States Code, separating it from peripheral technical assistance functions and directing it to the most productive areas;

"(D) complete action on recommendations of the Commission on Federal Paperwork by implementing, implementing with modification or rejecting such recommendations

including, where necessary, development of legislation to implement such recommendations.

"(E) develop, in consultation with the Administrator of General Services, a five-year plan for meeting the automatic data processing and telecommunications needs of the Federal Government in accordance with the requirements of section 111 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 759) and the purposes of this chapter; and

"(F) submit to the President and the Congress legislative proposals to remove inconsistencies in laws and practices involving privacy, confidentiality, and disclosure of information.

41 USC 3506

"§ 3506. Federal agency responsibilities

"(a) Each agency shall be responsible for carrying out its information management activities in an efficient, effective, and economical manner, and for complying with the information policies, principles, standards, and guidelines prescribed by the Director.

"(b) The head of each agency shall designate, within three months after the effective date of this Act, a senior official or, in the case of military departments, and the Office of the Secretary of Defense, officials who report directly to such agency head to carry out the responsibilities of the agency under this chapter. If more than one official is appointed for the military departments the respective duties of the officials shall be clearly delineated.

"(c) Each agency shall—

"(1) systematically inventory its major information systems and periodically review its information management activities, including planning, budgeting, organizing, directing, training, promoting, controlling, and other managerial activities involving the collection, use, and dissemination of information;

"(2) ensure its information systems do not overlap each other or duplicate the systems of other agencies;

"(3) develop procedures for assessing the paperwork and reporting burden of proposed legislation affecting each agency;

"(4) assign to the official designated under subsection (b) the responsibility for the conduct of and accountability for any acquisitions made pursuant to a delegation of authority under section 111 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 759); and

"(5) ensure that information collection requests required by law or to obtain a benefit, and submitted to nine or fewer persons, contain a statement to inform the person receiving the request that the request is not subject to the requirements of section 3507 of this chapter.

"(d) The head of each agency shall establish such procedures as necessary to ensure the compliance of the agency with the requirements of the Federal Information Locator System, including necessary screening and compliance activities.

41 USC 3507

"§ 3507. Public information collection activities—submission to Director; approval and delegation

"(a) An agency shall not conduct or sponsor the collection of information unless, in advance of the adoption or revision of the request for collection of such information—

"(1) the agency has taken actions, including consultation with the Director, to—

Agency Procedures and Submissions

"(A) eliminate, through the use of the Federal Information Locator System and other means, information collections which seek to obtain information available from another source within the Federal Government;

"(B) reduce to the extent practicable and appropriate the burden on persons who will provide information to the agency; and

"(C) formulate plans for tabulating the information in a manner which will enhance its usefulness to other agencies and to the public;

"(2) the agency (A) has submitted to the Director the proposed information collection request, copies of pertinent regulations and other related materials as the Director may specify, and an explanation of actions taken to carry out paragraph (1) of this subsection, and (B) has prepared a notice to be published in the Federal Register stating that the agency has made such submission; and

"(3) the Director has approved the proposed information collection request, or the period for review of information collection requests by the Director provided under subsection (b) has elapsed.

"(b) The Director shall, within sixty days of receipt of a proposed information collection request, notify the agency involved of the decision to approve or disapprove the request and shall make such decisions publicly available. If the Director determines that a request submitted for review cannot be reviewed within sixty days, the Director may, after notice to the agency involved, extend the review period for an additional thirty days. If the Director does not notify the agency of an extension, denial, or approval within sixty days for, if the Director has extended the review period for an additional thirty days and does not notify the agency of a denial or approval within the time of the extension, a control number shall be assigned without further delay, the approval may be inferred, and the agency may collect the information for not more than one year.

"(c) Any disapproval by the Director, in whole or in part, of a proposed information collection request of an independent regulatory agency, or an exercise of authority under section 3504(h) or 3509 concerning such an agency, may be voided, if the agency by a majority vote of its members overrides the Director's disapproval or exercise of authority. The agency shall certify each override to the Director, shall explain the reasons for exercising the override authority. Where the override concerns an information collection request, the Director shall without further delay assign a control number to such request, and such override shall be valid for a period of three years.

"(d) The Director may not approve an information collection request for a period in excess of three years.

"(e) If the Director finds that a senior official of an agency designated pursuant to section 3506(b) is sufficiently independent of program responsibility to evaluate fairly whether proposed information collection requests should be approved and has sufficient resources to carry out this responsibility effectively, the Director may, by rule in accordance with the notice and comment provisions of chapter 5 of title 5, United States Code, delegate to such official the authority to approve proposed requests in specific program areas, for specific purposes, or for all agency purposes. A delegation by the Director under this section shall not preclude the Director from reviewing individual information collection requests if the Director

Am. p. 2815,  
part. p. 2821

Am. p. 2819

§ 1351, last of any

determines that circumstances warrant such a review. The Director shall retain authority to revoke such delegations, both in general and with regard to any specific matter. In acting for the Director, any official to whom approval authority has been delegated under this section shall comply fully with the rules and regulations promulgated by the Director.

"(f) An agency shall not engage in a collection of information without obtaining from the Director a control number to be displayed upon the information collection request.

"(g) If an agency head determines a collection of information (1) is needed prior to the expiration of the sixty-day period for the review of information collection requests established pursuant to subsection (b), (2) is essential to the mission of the agency, and (3) the agency cannot reasonably comply with the provisions of this chapter within such sixty-day period because (A) public harm will result if normal clearance procedures are followed, or (B) an unanticipated event has occurred and the use of normal clearance procedures will prevent or disrupt the collection of information related to the event or will cause a statutory deadline to be missed, the agency head may request the Director to authorize such collection of information prior to expiration of such sixty-day period. The Director shall approve or disapprove any such authorization request within the time requested by the agency head and, if approved, shall assign the information collection request a control number. Any collection of information conducted pursuant to this subsection may be conducted without compliance with the provisions of this chapter for a maximum of ninety days after the date on which the Director received the request to authorize such collection.

"§ 3508. Determination of necessity for information; hearing

"Before approving a proposed information collection request, the Director shall determine whether the collection of information by an agency is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility. Before making a determination the Director may give the agency and other interested persons an opportunity to be heard or to submit statements in writing. To the extent, if any, that the Director determines that the collection of information by an agency is unnecessary, for any reason, the agency may not engage in the collection of the information.

"§ 3509. Designation of central collection agency

"The Director may designate a central collection agency to obtain information for two or more agencies if the Director determines that the needs of such agencies for information will be adequately served by a single collection agency, and such sharing of data is not inconsistent with any applicable law. In such cases the Director shall prescribe (with reference to the collection of information) the duties and functions of the collection agency so designated and of the agencies for which it is to act as agent (including reimbursement for costs). While the designation is in effect, an agency covered by it may not obtain for itself information which it is the duty of the collection agency to obtain. The Director may modify the designation from time to time as circumstances require. The authority herein is subject to the provisions of section 3507(c) of this chapter.

Am. p. 2819

44 USC 2610

"§ 2610. Cooperation of agencies in making information available to another agency. (a) The Director may direct an agency to make available to another agency, or an agency may make available to another agency, information obtained pursuant to an information collection request if the disclosure is not inconsistent with any applicable law.

"(b) If information obtained by an agency is released by that agency to another agency, all the provisions of law (including penalties which relate to the unlawful disclosure of information) apply to the officers and employees of the agency to which information is released to the same extent and in the same manner as the provisions apply to the officers and employees of the agency which originally obtained the information. The officers and employees of the agency to which the information is released, in addition, shall be subject to the same provisions of law, including penalties, relating to the unlawful disclosure of information as if the information had been collected directly by that agency.

44 USC 2611

"§ 2611. Establishment and operation of Federal Information Locator System

"(a) There is established in the Office of Information and Regulatory Affairs a Federal Information Locator System (hereinafter in this section referred to as the 'System') which shall be composed of a directory of information resources, a data element dictionary, and an information referral service. The System shall serve as the authoritative regulator of all information collection requests.

"(b) In designing and operating the System, the Director shall—

"(1) design and operate an indexing system for the System; (2) require the head of each agency to prepare in a form specified by the Director, and to submit to the Director for inclusion in the System, a data profile for each information collection request of such agency;

"(3) compare data profiles for proposed information collection requests against existing profiles in the System, and make available the results of such comparison to—

"(A) agency officials who are planning new information collection activities; and

"(B) on request, members of the general public; and (4) ensure that no actual data, except descriptive data profiles necessary to identify duplicative data or to locate information, are contained within the System.

44 USC 2612

"§ 2612. Public protection

"Notwithstanding any other provision of law, no person shall be subject to any penalty for failing to maintain or provide information to any agency if the information collection request involved was made after December 31, 1981, and does not display a current control number assigned by the Director, or fails to state that such request is not subject to this chapter.

44 USC 2613

"§ 2613. Director review of agency activities: reporting; agency response

"(a) The Director shall, with the advice and assistance of the Administrator of General Services, selectively review, at least once every three years, the information management activities of each agency to ascertain their adequacy and efficiency. In evaluating the adequacy and efficiency of such activities, the Director shall pay

particular attention to whether the agency has complied with section 3506.

"(b) The Director shall report the results of the reviews to the appropriate agency head, the House Committee on Government Operations, the Senate Committee on Governmental Affairs, the House and Senate Committees on Appropriations, and the committees of the Congress having jurisdiction over legislation relating to the operations of the agency involved.

"(c) Each agency which receives a report pursuant to subsection (b) shall, within sixty days after receipt of such report, prepare and transmit to the Director, the House Committee on Government Operations, the Senate Committee on Governmental Affairs, the House and Senate Committees on Appropriations, and the committees of the Congress having jurisdiction over legislation relating to the operations of the agency, a written statement of measures taken to alleviate or remove any problems or deficiencies identified in such report.

"§ 2614. Responsiveness to Congress

"(a) The Director shall keep the Congress and its committees fully and currently informed of the major activities under this chapter, and shall submit a report thereon to the President of the Senate and the Speaker of the House of Representatives annually and at such other times as the Director determines necessary. The Director shall include in any such report—

"(1) proposals for legislative action needed to improve Federal information management, including, with respect to information collection, recommendations to reduce the burden on individuals, small businesses, State and local governments, and other persons;

"(2) a compilation of legislative impediments to the collection of information which the Director concludes that an agency needs but does not have authority to collect;

"(3) an analysis by agency, and by categories the Director finds useful and practicable, describing the estimated reporting hours required of persons by information collection requests, including to the extent practicable the direct budgetary costs of the agencies and identification of statutes and regulations which impose the greatest number of reporting hours;

"(4) a summary of accomplishments and planned initiatives to reduce burdens of Federal information collection requests;

"(5) a tabulation of areas of duplication in agency information collection requests identified during the preceding year and efforts made to preclude the collection of duplicate information, including designations of central collection agencies;

"(6) a list of each instance in which an agency engaged in the collection of information under the authority of section 3507(g) and an identification of each agency involved;

"(7) a list of all violations of provisions of this chapter and rules, regulations, guidelines, policies, and procedures issued pursuant to this chapter; and

"(8) with respect to recommendations of the Commission on Federal Paperwork—

"(A) a description of the specific actions taken on or planned for each recommendation;

"(B) a target date for implementing each recommendation accepted but not implemented; and

ANAL. P. 2819  
Report to  
congressional  
committees

Written  
statement  
submitted to  
congressional  
committees

44 USC 2614  
Report to  
President of the  
Senate and  
Speaker of the  
House

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"(C) an explanation of the reasons for any delay in completing action on such recommendations

"(b) The preparation of any report required by this section shall not increase the collection of information burden on persons outside the Federal Government.

44 USC 3515

"§ 3515. Administrative powers

"Upon the request of the Director, each agency (other than an independent regulatory agency) shall, to the extent practicable, make its services, personnel, and facilities available to the Director for the performance of functions under this chapter.

44 USC 3516

"§ 3516. Rules and regulations

"The Director shall promulgate rules, regulations, or procedures necessary to exercise the authority provided by this chapter.

44 USC 3517

"§ 3517. Consultation with other agencies and the public

"In development of information policies, plans, rules, regulations, procedures, and guidelines and in reviewing information collection requests, the Director shall provide interested agencies and persons early and meaningful opportunity to comment.

44 USC 3518

"§ 3518. Effect on existing laws and regulations

"(a) Except as otherwise provided in this chapter, the authority of an agency under any other law to prescribe policies, rules, regulations, and procedures for Federal information activities is subject to the authority conferred on the Director by this chapter.

"(b) Nothing in this chapter shall be deemed to affect or reduce the authority of the Secretary of Commerce or the Director of the Office of Management and Budget pursuant to Reorganization Plan No. 1 of 1977 (as amended) and Executive order, relating to telecommunications and information policy, procurement and management of telecommunications and information systems, spectrum use, and related matters.

5 USC app. 3  
17th 1978 Comp.  
p. 154

"(c)(1) Except as provided in paragraph (2), this chapter does not apply to the collection of information--

"(A) during the conduct of a Federal criminal investigation or prosecution, or during the disposition of a particular criminal matter;

"(B) during the conduct of (i) a civil action to which the United States or any official or agency thereof is a party or (ii) an administrative action or investigation involving an agency against specific individuals or entities;

"(C) by compulsory process pursuant to the Antitrust Civil Process Act and section 13 of the Federal Trade Commission Improvement Act of 1980; or

15 USC 1311  
Ant. p. 390  
56 USC 401 note

"(D) during the conduct of intelligence activities as defined in section 4-206 of Executive Order 12036, issued January 24, 1978, or successor orders, or during the conduct of cryptologic activities that are communications security activities

"(2) This chapter applies to the collection of information during the conduct of general investigations (other than information collected in an antitrust investigation to the extent provided in subparagraph (C) of paragraph (1)) undertaken with reference to a category of individuals or entities such as a class of licensees or an entire industry.

"(d) Nothing in this chapter shall be interpreted as increasing or decreasing the authority conferred by Public Law 89-306 on the Administrator of the General Services Administration, the Secretary

of Commerce, or the Director of the Office of Management and Budget.

"(e) Nothing in this chapter shall be interpreted as increasing or decreasing the authority of the President, the Office of Management and Budget or the Director thereof, under the laws of the United States, with respect to the substantive policies and programs of departments, agencies and offices, including the substantive authority of any Federal agency to enforce the civil rights laws.

"§ 3519. Access to information

44 USC 3519

"Under the conditions and procedures prescribed in section 313 of the Budget and Accounting Act of 1921, as amended, the Director and personnel in the Office of Information and Regulatory Affairs shall furnish such information as the Comptroller General may require for the discharge of his responsibilities. For this purpose, the Comptroller General or representatives thereof shall have access to all books, documents, papers and records of the Office.

Ant. p. 312

"§ 3520. Authorization of appropriations

44 USC 3520.

"There are hereby authorized to be appropriated to carry out the provisions of this chapter, and for no other purpose, sums--

"(1) not to exceed \$5,000,000 for the fiscal year ending September 30, 1981;

"(2) not to exceed \$5,500,000 for the fiscal year ending September 30, 1982; and

"(3) not to exceed \$3,000,000 for the fiscal year ending September 30, 1983."

(b) The item relating to chapter 35 in the table of chapters for such title is amended to read as follows:

"35 Coordination of Federal Information Policy."

44 USC 2904.

(c)(1) Section 2904(10) of such title is amended to read as follows:

"(10) report to the appropriate oversight and appropriations committees of the Congress and to the Director of the Office of Management and Budget annually and at such other times as the Administrator deems desirable (A) on the results of activities conducted pursuant to paragraphs (1) through (9) of this section, (B) on evaluations of responses by Federal agencies to any recommendations resulting from inspections or studies conducted under paragraphs (8) and (9) of this section, and (C) to the extent practicable, estimates of costs to the Federal Government resulting from the failure of agencies to implement such recommendations."

44 USC 2905

(2) Section 2905 of such title is amended by redesignating the text thereof as subsection (a) and by adding at the end of such section the following new subsection:

Studies

"(b) The Administrator of General Services shall assist the Administrator for the Office of Information and Regulatory Affairs in conducting studies and developing standards relating to record retention requirements imposed on the public and on State and local governments by Federal agencies."

44 USC 3503

Sac. 3. (a) The President and the Director of the Office of Management and Budget shall delegate to the Administrator for the Office of Information and Regulatory Affairs all functions, authority, and responsibility under section 103 of the Budget and Accounting Procedures Act of 1950 (31 USC 18b).

(b) The Director of the Office of Management and Budget shall delegate to the Administrator for the Office of Information and

note

44 USC 759



Regulatory Affairs all functions, authority, and responsibility of the Director under section 552a of title 5, United States Code, under Executive Order 12046 and Reorganization Plan No. 1 for telecommunications, and under section 111 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 759).

Sec. 4. (a) Section 409A of the General Education Provisions Act is amended by (1) striking out "and" after "institutions" in subsection (a)(1)(A) and inserting in lieu thereof "or", and (2) by amending subsection (a)(3)(B) to read as follows:

"(B) No collection of information or data acquisition activity subject to such procedures shall be subject to any other review, coordination, or approval procedure outside of the relevant Federal agency, except as required by this subsection and by the Director of the Office of Management and Budget under the rules and regulations established pursuant to chapter 35 of title 44, United States Code. It is a requirement for information is submitted pursuant to this Act for review, the timetable for the Director's approval established in section 3507 of the Paperwork Reduction Act of 1980 shall commence on the date the request is submitted, and no independent submission to the Director shall be required under such Act."

(b) Section 201(e) of the Surface Mining Control and Reclamation Act of 1977 (30 U.S.C. 1211) is repealed.

(c) Section 708(f) of the Public Health Service Act (42 U.S.C. 292h(f)) is repealed.

(d) Section 5315 of title 5, United States Code, is amended by adding at the end thereof the following:

"Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget."

Sec. 5. This Act shall take effect on April 1, 1981.

Approved December 11, 1980.

3 CFR 1978  
Comp. p. 186, 5  
USC 499  
29 USC 1211-3

Am. p. 2812

Am. p. 2819

Repeal

Effective date  
41 USC 3501  
note.

#### LEGISLATIVE HISTORY—

HOUSE REPORT No. 96-835 (Comm. on Government Operations).  
SENATE REPORT No. 96-930 accompanying S. 1411 (Comm. on Governmental  
Affairs).  
(CONGRESSIONAL RECORD, Vol. 126 (1980):  
Mar. 24, considered and passed House.  
Mar. 19, 9 (141) considered and passed Senate; passage vacated and H.R. 6410,  
amended, passed in lieu  
Dec. 1, House concurred in Senate amendments  
WEEKLY COMPILATION OF PRESIDENTIAL DOCUMENTS, Vol. 16, No. 50  
Dec. 11, Presidential statement.

END

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